CHAPTER 5.0

ALTERNATIVES TO THE PROPOSED PROJECT

CHAPTER 5 – ALTERNATIVES TO THE PROPOSED PROJECT

This chapter of the EIR is intended to implement the requirements set forth in State CEQA Guidelines Section 15126.6.

5.1 Rationale for Alternatives Selection

State CEQA Guidelines (Section 15126.6(a)) states:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible (14 CCR 15000 et seq.).

In accordance with State CEQA Guidelines, Section 15126.6(f)(1), criteria that were taken into consideration in determining the feasibility of various alternatives include site suitability, economic viability, and availability of infrastructure. This section of the CEQA Guidelines also requires an EIR to identify the environmentally superior alternative other than the "No Project" alternative (14 CCR 15000 et seq.). The environmental assessment provided in this section will enable the County of San Diego to exercise greater discretion in its evaluation and ultimate decisions regarding whether to approve the project as proposed, to approve a project with changes such as those described in the following alternatives, or to reject the proposed project or any alternatives at this time. The State CEQA Guidelines limit alternatives to those "that would avoid or substantially lessen any of the significant effects of the project…even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (Sections 15126.6(f) and (c)). The EIR is only required to examine in detail those that could "feasibly attain most of the basic objectives of the project" (Section 15126.6(f)).

This section discusses five land use alternatives to the proposed project, including Alternative A—No Project/No Development, Alternative B—No Project/Existing General Plan, Alternative C—785-Unit Reduced Footprint Alternative, Alternative D—1,300-Unit Reduced Footprint Alternative, and Alternative E—General Plan (GP) 2020 Consistent. These alternatives are compared to the impacts of the proposed project and are assessed relative to their ability to meet the basic objectives of the proposed project. As described in Chapter 1.0, the proposed project objectives include the following:

1) **Accommodate Existing and Projected Demand for Housing and Related Commercial Uses** – Accommodate demand for housing and commercial uses along the I-15 corridor to improve jobs/housing balance, including the following:

   - Respond to the demand for affordable housing in the region
   - Provide economically viable on-site commercial uses that augment existing adjacent commercial uses and serve both the proposed development and broader community needs.

2) **Promote a Compatible Community Design** – Provide a variety of residential land uses, consistent with conservation of biological and visual resources, that meet the demand for housing in the region and are compatible with the character of the Twin Oaks and Bonsall communities, incorporating the following additional community design goals:

   - Establish a sense of place
   - Provide public facilities and infrastructure concurrent with need, and contribute equitably to broader community needs as identified in concert with service providers
   - Provide a fire-safe community, utilizing defensible space principles
   - Incorporate green materials in building design and construction, as feasible.

3) **Provide for Meaningful Conservation of Biological Resources** – Provide for meaningful conservation of biological resources by permanently conserving and managing sensitive habitats and wildlife movement corridors in a configuration that is consistent with the NCCP and contributes to the draft subregional plan (the NCMSCP), including provision of funding for management, conservation, and enhancement of natural lands.

4) **Maintain the Visual Resources of the Merriam Mountains** – Maintain visual resources and the character of natural landforms by conserving visual features, such as prominent ridgelines and rock outcrops, and by minimizing visibility of the proposed development from key public vantage points.

5) **Provide Accessible Public Recreational Opportunities** – Provide accessible public recreational opportunities consistent with conservation of biological resources and connecting to regional recreational uses, as appropriate, to ensure public use and enjoyment of open space lands, while at the same time providing for good stewardship of the land.

6) **Provide an Economically Viable Planned Community** – Provide an economically viable planned community contributing to meeting housing and commercial needs in the region.

In addition to the proposed project land use alternatives (Alternatives A through E), an alternative alignment for off-site roadway improvements along Deer Springs Road has been provided (Alternative F).

The analysis of alternatives in this section focuses primarily on effects found to be significant and unavoidable through the project environmental analysis, as discussed in Chapters 2.0 and 3.0. Together or in combination, this range of alternatives addresses all the significant impacts identified in the project environmental analysis. The following discussion describes the characteristics of each of the alternatives addressed in this section, the rationale for its inclusion, a comparison of the environmental effects associated with the proposed project versus each alternative, and the basis for preference of the proposed project over the alternatives. Table 5.1-1 includes a comparison of unavoidable significant impacts under the proposed project to alternative impacts for air quality, traffic, mineral resources, noise, and cultural resources.

Over the years, the Merriam Mountains area has been the subject of a number of development proposals, none of which have been approved or implemented. During the 1970s, an assessment district was formed to install two water reservoirs and numerous pipelines that would provide water service to essentially all the parcels and landowners within the Specific Plan area. Although the water system was built and has been operational for many years, no development has occurred. The next proposal was an undated development proposal for approximately 100 estate lots at the end of Sarver Lane that was never submitted to the County of San Diego for review. In 1986, efforts were undertaken for a 40-unit Planned Residential Development (PRD) for the portion of the site surrounding the abandoned landing strip and the quarry area. This PRD proposal also was never submitted for review to the County of San Diego. In 2000, Stonegate Development submitted a Plan Amendment Application (PAA) (00-04) for Montecez, a 2,180-acre, 542-dwelling-unit proposal, which was withdrawn.

In addition to the alternatives discussed in this section and the prior proposals, several alternatives have been considered and rejected for the Merriam site as part of the current EIR process.

As part of this current EIR process, the applicant has considered a variety of alternatives in addition to the proposed project and those discussed in detail in this section. In July 2003, Stonegate Merriam Mountains, LLC, filed PAA 03-113 for Merriam Mountains, a 2,391-unit master-planned community on 2,320 acres. That submittal included development of five residential neighborhoods with one neighborhood (known as Neighborhood 5 in that submittal)

extending into the northern portion of the site in the area around the abandoned landing strip and quarry. County of San Diego staff and Wildlife Agencies' comments on that proposal objected to the extension of the residential area known as Neighborhood 5 into the northern portion of the site, which the Wildlife Agencies considered to be important for establishment of a Merriam Mountains core area under the draft NCMSCP. Discussions among the applicant, County of San Diego staff, and the Wildlife Agencies ultimately led to execution of a "Hardline" Agreement for biological open space that clusters development in the southern portion of the property and focuses biological preservation in the northern portion of the property, including the area previously proposed for development of what was then known as Neighborhood 5. Also during this time, an additional property was added to the project site at the intersection of Deer Springs Road and Meadow Park Lane. Due to concerns about potentially significant biological effects and acquisition of additional property by the applicant, the original PAA 03-113 development alternative was rejected.

An additional "Neighborhood 5 Pullback" alternative was considered and rejected as part of the current EIR process as a result of the San Diego County and Wildlife Agencies' discussions. This Neighborhood 5 Pullback alternative included a Neighborhood 5 in the northern portion of the property but provided for a larger habitat block. This alternative was rejected because it did not incorporate a biological open space design consistent with the Hardline Agreement ultimately negotiated with County of San Diego staff and the Wildlife Agencies.

A reduced project footprint alternative consisting of 1,700 dwelling units clustered in the southern half of the project site was also considered and rejected as part of the current EIR process. This reduced dwelling unit alternative was evaluated to determine whether it would avoid or substantially reduce significant and unavoidable impacts identified under the proposed project. During analysis of this alternative, it was determined that the reduction to 1,700 dwelling units would not avoid or substantially lessen impacts identified as significant and unavoidable under the proposed project. Specifically, the reduced dwelling unit alternative would not lessen the project's significant unavoidable cumulative noise impacts to a level below significance or reduce them by a substantial amount. This alternative would also not substantially lessen project impacts related to air quality during construction. Under this alternative, the amount of blasting, mass grading, paved surfaces, and buildings constructed would not be substantially reduced compared to the proposed project; therefore, construction emissions would remain significant and unavoidable, similar to the proposed project. The reduced dwelling unit alternative would have the same impacts on mineral resources as the proposed project. This alternative was therefore rejected without further analysis.

A variety of primary and secondary access alternatives were considered during the project planning process, including alternative alignments for Deer Springs Road and alternative

secondary access roads to address fire safety/emergency evacuation issues. Alternative alignments for Deer Springs Road are discussed in the Deer Springs Road Technical Report included as Appendix C to the Resource Protection Study (the Resource Protection Study is included as Appendix F to this EIR). The Technical Report (Dudek 2007) considers various alignments with the goal of minimizing impacts to Resource Protection Ordinance (RPO) resources, while at the same time providing a facility that would meet projected demand under the proposed project and GP 2020. The selected Deer Springs Road alignment analyzed in this EIR meets the County of San Diego design standards, avoids most RPO resources, and is consistent with the County of San Diego Circulation Element (1994). However, because the proposed alignment will have a significant and unavoidable impact on two culturally important sites, Alternative F has been included as an alternative that lessens or avoids impacts to RPO cultural resources.

Secondary access roads considered during the planning process include Lawrence Welk Court and Camino Mayor. Also considered and rejected was a secondary access road known as Rock Bluff Lane. This roadway would have traversed the northwestern portion of the proposed biological open space and was included in the September 20, 2005, Hardline Agreement negotiated with the Wildlife Agencies and County of San Diego staff. Subsequent to that agreement, and as part of ongoing discussions regarding fire management plans, Rock Bluff Road was eliminated and a shorter, gated, emergency access road, Camino Mayor, was incorporated into the project design. This design feature results in less disturbance in the designated biological open space than would have occurred with Rock Bluff Lane.

In accordance with State CEQA Guidelines, Section 15126.6(f)(2), an alternative project site location should be considered if development of another site is feasible and if its development would avoid or substantially lessen significant impacts of the proposed project (14 CCR 15000 et seq.).

An alternate site need not be evaluated in the EIR if the Lead Agency concludes that no feasible alternative locations exist that meet basic project objectives. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability (including location, size, and land use designation); economic viability; availability of infrastructure; and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

In this case, an alternative site has not been evaluated under CEQA because no feasible alternative site is available that meets basic project objectives.

The proposed project covers 2,327 acres and consolidates 58 parcels held in 19 different ownerships located adjacent to a major transportation corridor (I-15) linking San Diego and

Riverside counties. In addition, the proposed project is located adjacent to urban lands, within service areas for wastewater, potable water, and other public services (e.g., police, fire, schools). The proposed project also includes 1,192 acres of biological open space within the draft NCMSCP Subarea Working Map, identified as "Properties currently being negotiated for hardline preserve."

There are no alternative sites in northern San Diego County with similar acreage under the control of a single developer, with convenient access to the I-15 corridor, and with available infrastructure. Each of these elements is essential to meeting the project objective of a large master-planned community serving San Diego County. The location, size, and geography of the project site are highly unusual. In addition, there are no alternative sites with a large block of habitat available to serve as a significant biological core area and linkage west of the I-15.

Due to the fragmented ownership patterns within the vicinity of the project site, no other feasible location for a large master-planned community with a biological open space component is available. In addition, since the applicant cannot reasonably acquire, control, or otherwise have access to an alternative site, off-site alternatives are considered infeasible.

The availability of alternatives which would feasibly attain most of the basic objectives of the project but would also avoid or substantially lessen the significant effects of the project was considered as part of the current EIR process. No additional alternatives were identified that would meet these criteria. As discussed below, none of the alternatives fully meet the project objectives, primarily because avoidance or reduction of significant impacts requires reducing densities below the level where the objectives can be feasibly attained. There are no alternatives that meet the project objective of permanently preserving +/- 1200 acres of biological open space in accordance with the NCCP and draft NCMSCP while avoiding or substantially lessening impacts to mineral resources, because the minerals are located within the area proposed for permanent open space important to the future NCMSCP. There are no lower-density alternatives that meet the project objective of permanently preserving +/- 1200 acres of biological open space, because the cost of open space acquisition and management cannot feasibly be supported by a reduced number of units and adopted mitigation ratios for a reduced development footprint can be fully satisfied with a smaller preservation area. There are no alternatives that meet the project objective of accommodating housing and commercial demand while avoiding or substantially lessening significant traffic impacts, because of current service levels on area roads. There are no alternatives that meet the project objectives of accommodating housing and commercial demand and permanently preserving a +/-1200-acre biological open space while avoiding or substantially lessening significant traffic impacts, because the required density reductions would prevent feasible attainment of the objectives.

In summary, the project design process has been a lengthy and iterative one, incorporating concerns regarding biological resources, traffic circulation, fire management, public safety, and a variety of other issues. As a result of the iterative design process, the originally proposed development envelope was reduced and made more compact, and the arrangement and mix of land uses was refined, resulting in the currently proposed project.

5.2 Analysis of Alternative A—No Project/No Development Alternative

5.2.1 Alternative A—No Project/No Development Alternative Description and Setting

This alternative is required under Section 15126.6(e) of the State CEQA Guidelines. This alternative represents a possible scenario that could occur if the proposed project were withdrawn or not approved. This alternative assumes that no development would occur on the site for now. The site would remain in its existing condition with 58 parcels with 19 different owners as depicted on Figure 5.1-1.

5.2.2 Comparison of the Effects of Alternative A—No Project/No Development Alternative to the Proposed Project

Air Quality

The No Project/No Development Alternative would avoid the significant construction air quality impacts of the proposed project as emissions from construction would not occur, and long-term air emissions from increased vehicle trips would not be generated as under the proposed project. Greenhouse gas (GHG) emissions under this alternative would not be generated during construction and would also not be generated during project operation from vehicle trips.

Aesthetics

Implementation of the No Project/No Development Alternative would result in preservation of existing views of the undeveloped project site. This alternative would have fewer impacts to aesthetics than the project, but neither this alternative nor the project would have significant unavoidable impacts.

Biological Resources

The No Project/No Development Alternative would not result in clearing, grading, or construction of any type, and would therefore avoid disturbance of approximately 1,135 acres on the project site (including 538 acres of development footprint, 537 acres for fuel modification, and 60 acres for access roads). Although it would not preclude preparation of a subregional NCCP, this alternative would not provide permanent open space and would not contribute to

assembly of a permanent biological preserve under the NCCP or the draft NCMSCP. This alternative would have fewer impacts to biological resources than the project would, but neither this alternative nor the project would have significant unavoidable biological impacts.

Cultural Resources

Impacts to existing significant cultural resources on site due to grading would be avoided under the No Project/No Development Alternative. However, these sites are currently disturbed and could undergo further degradation by erosion or human-induced disturbance. This alternative would avoid significant unavoidable impacts to cultural resources of the proposed project.

Hazards

The No Project/No Development Alternative would eliminate exposure of the proposed residential and commercial development to wildfire hazards that would occur under the proposed project. However, under this alternative, the site would remain a high wildfire hazard, due to the large volume of unmanaged old-growth chaparral and other native wildfire fuels. Release of hazardous materials on the site would be avoided under this alternative, as grading, demolition, or introduction of people and structures to potentially hazardous materials would not occur as under the proposed project. Neither this alternative nor the project would have significant unavoidable impacts due to hazards.

Land Use

Under this alternative, the site would remain vacant and no change in on-site land use or land designations would occur. Land use compatibility and community character impacts would be avoided under this alternative. This alternative would have fewer impacts to land use than the proposed project, but neither this alternative nor the project would have significant unavoidable impacts.

Noise

Under this alternative, no development would occur, and the resulting construction and operational noise impacts of the proposed project would be avoided.

Traffic

This alternative would not result in the addition of any vehicle trips. Therefore, the significant traffic impacts identified for the proposed project would be avoided.

Hydrology and Water Quality

This alternative would not result in any changes to existing on-site hydrologic regimes or to the quantity or characteristics of runoff from the property. This alternative would have fewer impacts to hydrology and water quality than the proposed project, but neither this alternative nor the project would have significant unavoidable impacts.

Mineral Resources

This alternative would not result in any land use changes that would affect the potential to extract mineral resources on the project site, nor would it affect the quality or characteristics of existing on-site mineral resources. The opportunities and constraints for mineral resource extraction on the site would remain the same as under existing conditions, and potential impacts from the loss of availability of mineral resources identified for the proposed project would be avoided.

5.2.3 Rationale for Selection of Proposed Project over Alternative A—No Project/No Development Alternative

With implementation of the No Project/No Development Alternative, development would not occur as proposed. The No Project/No Development Alternative would avoid the following impacts associated with the proposed project: significant and unavoidable impacts to air quality, traffic, mineral resources, noise,, and cultural resources; significant but mitigated impacts to aesthetics, biological resources, land use, hazards, hydrology and geology; and less-than-significant impacts to public services, agricultural resources, and recreation. Although this alternative avoids a number of significant environmental impacts, it does not meet five of the six project objectives, including Objectives 1, 2, 3, 5, and 6. The No Project/No Development Alternative would not accommodate existing and projected regional housing demand, conserve biological resources, or create recreational opportunities. Because no development would occur, this alternative also would not meet the objective of providing a compatible community design or constructing an economically viable community. For these reasons, the proposed project is preferred over the No Project/No Development Alternative.

5.3 Analysis of Alternative B—No Project/Existing General Plan Alternative

5.3.1 Alternative B—No Project/Existing General Plan Alternative Description and Setting

This is a second “No Project” alternative, pursuant to Section 15126(e) of the State CEQA Guidelines, addressing the scenario that would occur if the project was withdrawn or not approved, and the site was developed according to existing land uses and densities permitted on the site under the County of San Diego General Plan, consistent with the County of San Diego

RPO. Assuming residential densities allowed pursuant to existing General Plan and zoning designations, as reduced under the RPO with regard to steep slopes and wetlands, the total number of possible residential units would be 345. In addition, development would include 3.5 acres of general commercial along with 27.2 acres of industrial. The development bubbles seen on Figure 5.1-2 represent a development pattern that could occur assuming a coordinated planning process with the backbone roadway network, infrastructure and mass grading undertaken by a single development entity. A coordinated planning and development process would provide the ability to avoid and minimize impacts to RPO steep slopes, wetlands and sensitive habitats on an overall development plan basis. Such a development process would enable a more compact form of development and consolidation of open space than would occur under a lot-by-lot development approach. Although there is no way to ensure coordinated development due to multiple ownerships, the development footprint shown on Figure 5.1-2 is a reasonable estimate of ground disturbance likely to occur under the Existing General Plan Alternative. Fuel modification would likely occur within the development area per County of San Diego requirements. Access to the site would be provided via Meadow Park Lane and Merriam Mountains Parkway. Under this alternative, development in the mineral resource designated area is not precluded, but reserving this area for mineral extraction (see Figure 5.1-2) would reduce the total permitted dwelling units to 262 dwelling units on the project site.

5.3.2 Comparison of the Effects of Alternative B—No Project/Existing General Plan Alternative to the Proposed Project

Air Quality

The No Project/Existing General Plan Alternative would result in a maximum of 345 dwelling units compared to 2,700 dwelling units under the proposed project. In addition, development would include 27.2 acres of industrial and 3.5 acres of general commercial development. The development footprint would be reduced from 598 acres under the proposed project to 465 acres under this alternative (see Figure 5.1-2). Construction activities would be completed through a coordinated planning effort, which would include roadway development, house construction, and infrastructure. Construction emissions associated with mass grading primarily include Respirable Particulate Matter (PM_{10}), Fine Particulate Matter ($PM_{2.5}$), and oxides of nitrogen (NO_X). Since this alternative would require substantially less grading (i.e., 5.5 vs. 12.2 million cu yd) and the number of pieces of construction equipment would be reduced along with disturbance, emissions would be substantially reduced for PM_{10}, $PM_{2.5}$, and NO_X. Carbon Monoxide (CO) emissions would also be reduced under this alternative, due to a 30% reduction in the blasting area and corresponding reduction in the required construction equipment. Volatile Organic Compounds (VOC) emissions are primarily associated with paved surfaces and coatings on built structures. Under this alternative, VOC emissions would be substantially reduced due to the reduction in

number of homes (2,700 dwelling units vs. 345 dwelling units) and the amount of paved surfaces (60% reduction from the proposed project). Based on the assumption that this project would be subject to standard air quality mitigation requirements, this alternative would likely avoid the direct and cumulative short-term significant construction emissions (PM_{10}, $PM_{2.5,}$ NO_X, CO, and VOC) anticipated with the proposed project.

With a reduction from 35,526 Average Daily Traffic (ADT) to 13,780 ADT, this alternative's long-term operation emissions are expected to be less than significant. This alternative would comply with the State Implementation Plan (SIP), since it complies with the existing General Plan.

Under this alternative, both the reduction in construction activity and vehicle trips generated during operation would result in a reduction in GHG emissions in comparison to the proposed project. GHG emissions during operation would also be reduced, as there would be less demand for both potable water and energy, since fewer dwelling units would be constructed.

Aesthetics

The No Project/Existing General Plan Alternative would be visually similar to existing rural residential development in the immediate vicinity and would result in scattered residences throughout the site with some steep slope disturbance and ridgeline development that would be visible to private and public viewers. As with the proposed project, this alternative would represent a visual change of the site from undeveloped to developed, but the change would be less intensive in the southern portion of the site than the proposed project, and development would be provided in the northern area, which is designated as biological open space under the proposed project. This alternative would have fewer impacts to aesthetics than the proposed project, but neither this alternative nor the project would have significant unavoidable effects.

Biological Resources

Under this alternative, the total disturbed area would be about 465 acres as compared to about 598 acres (development pads and roadways) under the proposed project. The development pattern under this alternative would be less compact than under the proposed project, extending development into the northern portion of the site within and north of the Mineral Resources Zone (MRZ) overlay. Biological open space under this alternative would be confined to the southern portion of the site, south of the MRZ overlay. The open space in this area would be sufficient to provide for the mitigation on a habitat basis and would also provide for some habitat blocks, though they would not function as well as the project's core habitat with connectivity to the north and west. Impacts to occupied California gnatcatcher habitat may or may not occur under this alternative, depending on the industrial and general commercial development in the southeast

portion of the site. If such impacts occurred, a Habitat Loss Permit (HLP) would be required. Compliance of this alternative with the NCCP would depend on specific development proposals, but with coordinated development, the alternative would not prevent or preclude preparation of a subregional NCCP or connectivity between areas of high habitat values. Overall, biological impacts under this alternative would be greater than the proposed project's with respect to preserve design, although neither the alternative nor the project would have significant unavoidable impacts to biological resources.

Cultural Resources

Impacts to cultural resources under this alternative would be similar to the project, because impacts would result from the Deer Springs Road improvements, the primary location of concern with respect to cultural resources. Since the Deer Springs Road widening is triggered with the first unit of development in the Merriam project, it is expected that this alternative would have the same significant and unavoidable cultural resource impacts as the proposed project. An alternate alignment for Deer Springs Road has been provided (see Alternative F, Section 5.7), which would reduce impacts to a level below significance. This alternate roadway alignment could be combined with the No Project/Existing General Plan Alternative, thereby reducing cultural resource impacts to a level below significance but increasing cumulative noise impacts.

Hazards

Impacts to hazards under this alternative would neither increase nor decrease compared to the proposed project, based on the assumption that County of San Diego requirements for fuel management zones and regulations for hazardous materials would apply to a coordinated development. Neither this alternative nor the project would have significant unavoidable impacts.

Land Use

This alternative would not require an amendment to the County of San Diego General Plan (i.e., a General Plan Amendment (GPA)) or the re-zoning that would occur under the proposed project. If development is not coordinated, this alternative would result in low-density, scattered rural residential land uses throughout the site, with 3.5 acres of commercial and 27.2 acres of industrial business park development in the southeast corner, compared to clustered residential development and contiguous open space that would occur under the proposed project. Assuming coordinated development, and assuming that use impacts associated with the project would be reduced under this alternative, neither this alternative nor the project would have significant unavoidable impacts.

Noise

Due to the fewer number of residential units, short-term noise impacts associated with construction traffic, blasting, rock-crushing, and earthmoving equipment during construction of the proposed project would be substantially reduced under this alternative. Under this alternative, noise impacts during construction would be reduced to less than significant with incorporation of the same mitigation measures applicable to the proposed project for construction completed onsite; however impacts would remain significant and unmitigated as under the proposed project for construction completed along Deer Springs Road.

Due to the fewer number of residential units and resulting vehicle trips compared to the proposed project (13,780 ADT vs. 35,526 ADT), this alternative would result in a reduced level of operational noise. For near-term, cumulative-plus-project noise impacts along Buena Creek Road to be reduced to a level below significance, the ADT along this roadway would need to be 17,400 ADT or less. The project's cumulatively significant and unavoidable noise impacts along Buena Creek Road would be reduced to less than significant under this alternative because cumulative vehicle trips would be reduced to 17,268 ADT, and the resulting noise increase along this roadway would be reduced to 3 dB. This alternative would eliminate a significant unavoidable noise impact of the project.

Traffic

The average daily traffic would be reduced under this alternative (35,526 ADT compared to 13,780 ADT (approximately 39% of the ADT generated by the proposed project)). However, due to the existing poor Level of Service (LOS) on surrounding roadways, this alternative would trigger many of the traffic improvements required of the proposed project. The combination of housing commercial, and industrial development under this alternative is not anticipated to eliminate any of the direct impacts identified for the proposed project. However, this alternative would likely result in fewer cumulative impacts as compared to the proposed project, due to the reduction in total ADT. The level of development under this alternative would result in significant unavoidable cumulative traffic impacts along the I-15 mainline freeway and SR 78 ramps, as would occur under the proposed project. The contribution would be somewhat less than under the proposed project but would remain significant and unavoidable.

Hydrology and Water Quality

This alternative would result in development on about 465 acres of the property, as compared to about 598 acres (development area and roadways) under the proposed project, although the development under this alternative would be less intense than under the proposed project. Alteration of existing hydrologic regimes, including urban runoff quantities and characteristics,

would occur with development under this alternative. A master drainage plan for the site would be prepared based on a coordinated development. Fewer impervious surfaces are anticipated under this alternative than under the proposed project, since the character of the development would be less intense and the footprint smaller. Overall, hydrologic impacts are likely to be less than for the proposed project, but neither this alternative nor the proposed project would have significant unavoidable impacts.

Mineral Resources

Under this alternative, extraction of mineral resources would not be precluded. As shown on Figure 5.1-2, if development were permitted in the mineral resource designated area, 345 dwelling units could be constructed and, if development were not permitted in the mineral resource area, 262 dwelling units could be constructed. Since development in the mineral resource area would not be precluded, the significant and unavoidable impacts to mineral resources identified for the proposed project would be reduced to less than significant under this alternative.

5.3.3 Rationale for Selection of Proposed Project over Alternative B—No Project/Existing General Plan Alternative

With implementation of the No Project/Existing General Plan Alternative, 345 dwelling units could be constructed along with 27.2 acres of industrial and 3.5 acres of general commercial development. The No Project/Existing General Plan Alternative would avoid significant and unavoidable impacts identified under the proposed project for air quality, mineral resources, and noise but not for traffic, and cultural resources. Although this alternative avoids or reduces some significant unavoidable impacts, it does not meet five of the six project objectives, including Objectives 1, 2, 3, 5, and 6. Under this alternative, project Objective 1 would not be fully met, as less housing would be constructed to meet regional demand and affordable housing would not be provided. This alternative would not meet project Objective 2, as a variety of residential land uses would not be provided per a compatible community design. In addition, this alternative would not meet project Objective 3 to the degree afforded by the proposed project, as the alternative would not result in conservation of the 1,192-acre biological open space in the Merriam Mountains core area consistent with the NCCP and the draft NCMSCP. Project Objective 5, which consists of providing accessible recreational opportunities, would also not be met under this alternative, as the opportunities for recreational facilities would be limited. Project Objective 6 would not be met under this alternative, as a master-planned community would not be provided. For these reasons, the No Project/Existing General Plan Alternative does not meet the project objectives listed in Section 1.2, and the proposed project is therefore preferred.

5.4 Analysis of Alternative C—785-Unit Reduced Footprint Alternative

5.4.1 Alternative C—785-Unit Reduced Footprint Alternative Description and Setting

This alternative assumes development of about 350 acres of the site with about 785 dwelling units and 5 acres of commercial development. Under this alternative, 10 estate lots would be constructed in the northern portion of the site. The commercial development would be located in the southwest portion of the project site adjacent to Deer Springs Road. This alternative would require a GPA (similar to the proposed project), as the proposed density would exceed the current density allotted to the site. This alternative would not include biological open space or recreational opportunities in the northern portion of the site, shown on Figure 5.1-3 as Future Planning Area. Development of the commercial uses in the southwest portion of the site, rather than the southeastern portion of the site as under the proposed project, would eliminate impacts to coastal sage scrub habitat occupied by one pair of California gnatcatchers. This alternative would be less visible from I-15, as commercial and multifamily development in the southeastern corner of the site would not occur.

Access to the project site would be provided via Meadow Park Lane and Merriam Mountains Parkway. Fuel modification and fire management under this alternative would be similar to that for the proposed project. Though a detailed fire management plan has not been developed under this alternative, it is likely that all fuel modification would not be confined within the identified 350-acre development area. Wastewater and potable water would be provided by the VWD as identified for the proposed project. Earthwork would be balanced with approximately 7 million cu yd of cut/fill.

This alternative would avoid on-site RPO wetlands, and development would be limited to areas that do not contain RPO steep slopes. Sensitive habitats (primarily coastal sage scrub) would not be impacted in the southeast portion of the site where commercial development is being proposed under the proposed project. An HLP therefore would not be required under this alternative.

Under this alternative, the project's cumulatively significant noise increase along Buena Creek Road would be reduced to a level below significance.

Impacts associated with widening Deer Springs Road would likely be the same as under the proposed project since, as discussed in this EIR, essentially any development on the site would trigger off-site improvements to Deer Springs Road. Impacts to RPO significant cultural resources would occur for off-site improvements along Deer Springs Road.

As shown in Figure 5.1-3, development under this alternative would occur in the flatter, non-sensitive habitat areas throughout the site. Under this alternative, it is assumed that all mitigation for impacts to biological resources would occur within the biological open space identified on Figure 5.1-3. The northern portion of the Specific Plan would include a Future Planning Area that could be used for mineral extraction, biological open space, or residential development. However, any future development or use of this land would require a Specific Plan Amendment, which would require CEQA review; therefore, under this alternative, land uses in the Future Planning Area are being neither proposed nor precluded.

5.4.2 Comparison of the Effects of Alternative C—785-Unit Reduced Footprint Alternative to the Proposed Project

Air Quality

This alternative would involve fewer dwelling units (785 as compared to 2,700) and a reduced area of ground disturbance (7 million cu yd compared to 12.2 million cu yd) than the proposed project. Blasting would be reduced by 30%, and paved roadway surfaces would be reduced by 35%. As a result of the reduced grading, fewer pieces of construction equipment, and smaller disturbed area, emissions would be substantially reduced for PM_{10}, $PM_{2.5,}$ and NO_X. CO emissions would also be reduced under this alternative due to the 30% reduction in blasting area and reduction in the number of construction vehicles required. VOC emissions are primarily associated with paved surfaces and coatings on built structures. Under this alternative, VOC emissions would be substantially reduced, due to the reduction in number of homes (785 dwelling units vs. 2,700 dwelling units) and amount of paved surfaces (35% reduction from the proposed project). Based on the assumption that standard air quality mitigation requirements would apply, this alternative would likely avoid the direct and cumulative short-term significant construction emissions (PM_{10}, $PM_{2.5,}$ NO_X, CO, and VOC) anticipated with the proposed project. Ground disturbance and construction vehicles would be reduced under this alternative, resulting in fewer GHG emissions generated during construction.

The reduced number of units would generate less vehicle traffic (13,780 ADT compared to 35,526 ADT) and therefore would result in fewer air emissions. GHG emissions generated during operation would also likely be reduced due to fewer vehicle trips being generated. Therefore, this alternative's long-term operation emissions would avoid the significant air quality impacts of the proposed project.

Aesthetics

This alternative would result in less landform alteration and less overall ground disturbance than the proposed project. This alternative would avoid all RPO steep slopes, while the proposed

project would avoid only RPO significant steep slopes. This alternative would be less visible from I-15, as commercial and multifamily development in the southeastern corner of the site would not occur. However, neither this alternative nor the proposed project would have significant unavoidable impacts to aesthetics.

Biological Resources

The total area of ground disturbance for development and fuel modification would be substantially less, at 350 ac, than the 598 acres (development footprint and secondary access roads) anticipated under the proposed project. Development would be consolidated in the southern portion of the site, as would occur under the proposed project. All biological mitigation would occur within the approximately 810 acres of biological open space shown south of the MRZ overlay as depicted on Figure 5.1-3. This area would be sufficient to provide for 810 acres of mitigation on a habitat basis and also would provide habitat blocks along the I-15 corridor and in the western portion of the development area that could contribute to the assembly of a Merriam Mountain core area and I-15 California gnatcatcher linkage as part of the draft NCMSCP. This alternative would not impact sensitive (coastal sage scrub) resources and would not require an HLP.

Although 4(d) findings would not be required for this alternative, the NCCP findings could be made. It would not preclude or prevent preparation of a subregional NCCP or connectivity between areas of high habitat value. Habitat loss under this alternative has been minimized and mitigated through preservation of approximately 810 acres of biological open space in the southern half of the property. Under this alternative, the northern portion of the site, designated as Future Planning Area, would remain available for preservation but would not be permanently restricted to biological open space uses at this time. This alternative would not preclude implementation of a subregional NCCP but would not fully meet the draft NCMSCP goal of permanently preserving a large block of habitat consistent with the designation of the Merriam Mountains as a San Diego County Resource Conservation Area (RCA).

The development pattern of this alternative could result in more fragmentation of the Merriam Mountains habitat block, with associated edge effects through future land use approvals. Although this alternative would have fewer direct impacts on biological resources and would not preclude creation of a preserve in the northern part of the Specific Plan area, it would not provide the same level of protection to the biological open space as the proposed project.

Cultural Resources

Similar to the project, on-site impacts to significant cultural resources would be avoided under this alternative. To the extent that off-site improvements to Deer Springs Road are required,

impacts to significant cultural resources would occur as under the proposed project. Thus, this alternative would result in significant and unavoidable cultural resource impacts resulting from widening Deer Springs Road, similar to the proposed project. However, this land use alternative could be combined with the alternative alignment of Deer Springs Road (Alternative F), which would reduce impacts to cultural resources to a level below significance.

Hazards

Impacts to hazards under this alternative would neither increase nor decrease compared to the proposed project, based on the assumption that standard County of San Diego requirements for fuel modification and regulations for hazardous materials would be implemented.

Land Use

This alternative would require an amendment to the County of San Diego General Plan (i.e., a GPA) as would occur under the proposed project. This alternative would result in 785 dwelling units with 5 acres of commercial development compared to the proposed project, which would include 2,700 dwelling units with 10 acres of commercial development. Placement of the commercial area adjacent to existing residential uses near Deer Springs Road may result in increased land use conflicts; however, through design measures and setbacks, impacts are expected to be reduced to a level below significance. Impacts to land use/planning would be mitigated to less than significant for both this alternative and the proposed project.

Noise

Under this alternative, noise impacts during construction would be reduced to less than significant with incorporation of the same mitigation measures applicable to the proposed project for construction completed onsite; however impacts would remain significant and unmitigated as under the proposed project for construction completed along Deer Springs Road.

Due to fewer dwelling units compared to the proposed project, operational noise associated with vehicle trips would be less than the proposed project. For near-term, cumulative-plus-project noise impacts along Buena Creek Road to be reduced to a level below significance, ADT along this roadway would need to be 17,400 ADT or less. Under this alternative, cumulative vehicle trips along Buena Creek Road would be reduced to 17,400 ADT, reducing the noise increase from 4 dB to 3 dB and reducing impacts to a level below significance. This alternative would likely require similar internal noise mitigation measures consisting of sound walls; however, vehicle trips along internal roadways would be reduced due to the smaller number of dwelling units. Cumulatively significant and unavoidable impacts for noise increase due to project-

generated traffic along Buena Creek Road would be reduced to less than significant under this alternative.

Traffic

As shown in Figure 5.1-3, access under this alternative would be from Merriam Mountains Parkway and Meadow Park Lane, similar to that under the proposed project. The reduced number of dwelling units under this alternative (785 vs. 2,700) would result in less trip generation (13,780 ADT vs. 35,526 ADT (approximately 38% of the ADT generated by the proposed project)) than under the proposed project, but similar off-site improvements to Deer Springs Road would be required, given the conclusions of the project Transportation/Traffic Study that essentially any development on the Merriam site would trigger the requirement to widen Deer Springs Road from 2 lanes to 4 lanes. The level of development under this alternative would result in significant unavoidable cumulative traffic impacts along the I-15 mainline freeway and SR 78 ramps, as would occur under the proposed project. Under this alternative, direct impacts would not be reduced from the proposed project but would remain significant. Cumulative impacts to intersections and roadway segments would be reduced due to the 62% reduction in total ADT. Overall, the contribution would be somewhat less than what would occur under the proposed project, but impacts would remain significant and unavoidable.

Hydrology and Water Quality

This alternative would result in less ground disturbance than would occur under the proposed project and introduction of fewer impervious surfaces on the project site. Under this alternative, the same water quality measures would be incorporated as in the proposed project, so the quantity and characteristics of runoff exiting the project site would not differ substantially from existing conditions. Neither this alternative nor the proposed project would have significant unavoidable impacts.

Mineral Resources

Under this alternative, areas identified as high value for mineral resource extraction (MRZ-2) would be neither developed nor placed in a biological open space preserve. A Specific Plan Amendment would be required before the northern portion of the site could be used for mineral resource extraction. Therefore, under this alternative, the development would not preclude potential extraction of mineral resources. The project's significant impacts to the availability of mineral resources for extraction would be reduced to less than significant under this alternative.

5.4.3 Rationale for Selection of Proposed Project over Alternative C—785-Unit Reduced Footprint

While this alternative substantially reduces several significant impacts anticipated with the proposed project, including impacts to air quality, mineral resources, and noise, it would not meet a majority of the project objectives. This alternative would not meet Objectives 1, 2, 3, and 5.

This alternative would not include affordable housing and a variety of residential land uses (Objectives 1 and 2). In addition, the biological open space to the north of the development area would not be permanently preserved in connection with the project, but it would be subject to future planning and discretionary development approvals. This alternative would not meet project Objective 3 of preserving a large block of habitat providing east–west connectivity and contributing to a potential NCMSCP preserve. This alternative would not include recreational trails, equestrian trails, and outlooks in the northern portion of the project site and therefore would not meet the goal of providing the recreational facilities to the public (Objective 5). As this alternative does not meet a majority of the project objectives, the proposed project is preferred.

5.5 Analysis of Alternative D—1,300-Unit Reduced Footprint Alternative

5.5.1 Alternative D—1,300-Unit Reduced Footprint Alternative Description and Setting

This alternative assumes development of about 450 acres of the site with about 1,300 dwelling units. The commercial development would be reduced in size from 10 acres to 5 acres and would be located in the southeast portion of the project site, generally in the same location as the project (Figure 5.1-4). Under this alternative, 10 estate lots would be constructed in the northern portion of the site.

This alternative would require a GPA (similar to the proposed project), as the density would exceed the current density allotted for the site. This alternative would not include biological open space or recreational opportunities in the northern portion of the site. Any future use of the Future Planning Area in the northern part of the site would require a Specific Plan Amendment and other discretionary approvals. With a Specific Plan amendment and related CEQA review, the area could be used for mineral extraction, biological open space, or development. Therefore, under this alternative, land uses in the Future Planning Area are being neither proposed nor precluded.

Wastewater and potable water would be provided by the VWD as identified for the proposed project. Earthwork would be balanced with approximately 9.5 million cu yd of cut/fill.

This alternative would avoid on-site RPO wetlands and steep slopes; however, impacts to RPO sensitive habitats (occupied coastal sage scrub) would be similar to the proposed project. Development of the commercial uses in the southeast portion of the site would impact approximately 5 acres of coastal sage scrub habitat occupied by one pair of California gnatcatchers. It is assumed that mitigation would be similar to the proposed project (off-site mitigation at the Captains' Associates parcel), and an HLP would be required under this alternative. No on-site impacts to significant cultural resources would occur.

As under Alternative C, this alternative would take access from Merriam Mountains Parkway and Meadow Park Lane and would trigger off-site improvements to Deer Springs Road. Proposed development would be visible from I-15, although landscape and design features could be incorporated to ensure consistency with the I-15 corridor design guidelines.

Fuel modification and fire management under this alternative would be similar to that for the proposed project. A detailed fire management plan has not been developed under this alternative, and it is unlikely that all fuel modification could be confined within the identified 450-acre development area; it may need to be expanded into other open space areas in the southern portion of the site, as occurs under the proposed project.

5.5.2 Comparison of the Effect of Alternative D—1,300-Unit Reduced Footprint Alternative to the Proposed Project

Air Quality

This alternative would involve fewer dwelling units (1,300 as compared to 2,700) and a reduced area of ground disturbance (9.5 million cu yd as compared to 12.2 million cu yd) than the proposed project. Blasting would also be reduced by 20%, and paved roadway surfaces would be reduced by 20%. Since the smaller disturbed area would require substantially less grading and fewer pieces of construction equipment, emissions would be substantially reduced for PM_{10}, $PM_{2.5}$, and NO_X. CO emissions would also be reduced under this alternative, due to a 20% reduction in blasting area and reduction in the number of construction vehicles required. VOC emissions are primarily associated with paved surfaces and coatings on built structures. Under this alternative, VOC emissions would be substantially reduced due to the reduction in number of structures (1,300 dwelling units vs. 2,700 dwelling units and 5 acres of commercial vs. 10 acres of commercial) and reduced paved surfaces (20% reduction from the proposed project). Based on the assumption that standard air quality mitigation requirements would apply, this alternative would likely avoid the short-term significant construction emissions (PM_{10}, $PM_{2.5}$,

NO_X, CO, and VOC) anticipated with the proposed project. Consequently, significant cumulative short-term construction impacts would also be avoided. Ground disturbance during construction would be less, requiring fewer pieces of construction equipment operating over a shorter duration than the proposed project, resulting in fewer GHG emissions generated during construction.

The reduced number of units would generate less vehicle traffic (19,060 ADT compared to 35,526 ADT) and therefore fewer air emissions. Under this alternative, both the reduction in construction activity and vehicle trips generated during operation would result in a reduction in GHG emissions in comparison to the proposed project. GHG emissions during operation would also be reduced, as there would be less demand for both potable water and energy, since fewer dwelling units would be constructed. Therefore, this alternative's long-term operation emissions would avoid the significant air quality impacts of the proposed project.

Aesthetics

This alternative would result in less landform alteration and less overall ground disturbance than the proposed project. Like the proposed project, this alternative would avoid all significant RPO steep slopes. This alternative would be visible from I-15, as development of commercial uses would occur in the southeastern portion of the site, adjacent to I-15. Landscape and design features would be incorporated under this alternative to ensure consistency with the I-15 corridor guidelines. Neither this alternative nor the proposed project would have significant unavoidable impacts.

Biological Resources

The total area of ground disturbance would generally be less under this alternative (450 acres compared to 598 ac). With reduced development, this alternative would be able to mitigate for biological impacts in a biological open space preserve of 710 acres in the southern portion of the site (see Figure 5.1-4). Therefore, the large habitat block consisting of 1,192 acres of permanently preserved area in the northern portion of the site would not be provided under this alternative. This alternative would provide for mitigation on a habitat basis in the area south of the MRZ overlay. From a preserve design standpoint, this alternative would also provide habitat blocks totaling 710 acres along the I-15 corridor and in the western portion of the site but not to the degree provided by the proposed project. This alternative would result in impacts to coastal sage scrub and the California gnatcatcher similar to the proposed project, and impacts would be mitigated through off-site purchase similar to the proposed project.

Under this alternative, a direct impact would occur to 5 acres of coastal sage scrub in the southeast portion of the site, requiring an HLP. NCCP and 4(d) findings could be made for this alternative because it would not preclude or prevent preparation of a subregional NCCP or

connectivity between areas of high habitat value. Habitat loss has been minimized and mitigated through preservation of approximately 710 acres of biological open space in large blocks in the southern half of the property. Under this alternative, the northern portion of the site, designated as Future Planning Area, would remain available for preservation but would not be permanently restricted to biological open space uses at this time. This alternative would not preclude implementation of a subregional NCCP but would not fully meet the draft NCMSCP goal of permanently preserving a large block of habitat as a San Diego County RCA. Therefore, Alternative D would have fewer direct impacts on biological resources, would preserve a sizable habitat block, and would not preclude acquisition of a preserve in the northern portion of the Specific Plan area. However, it would not provide the same level of protection to biological resources through permanent open space preservation as the proposed project.

Cultural Resources

On-site impacts to significant cultural resources would be avoided under this alternative. To the extent that off-site improvements to Deer Springs Road are required, impacts to significant cultural resources would occur as under the proposed project. Thus, this alternative would result in significant and unavoidable cultural resource impacts resulting from widening Deer Springs Road similar to the proposed project. However, Alternative D could be combined with Alternative F, which would reduce impacts to cultural resources to a level below significance.

Hazards

Impacts to hazards under this alternative would neither increase nor decrease compared to the proposed project, based on the assumption that standard County of San Diego requirements for fuel modification and regulations for hazardous materials would be implemented.

Land Use

This alternative would require an amendment to the County of San Diego General Plan (i.e., a GPA) as would occur under the proposed project. Land use compatibility and community character impacts under this alternative would be similar to the proposed project, as development would be clustered in the southern portion of the site. This alternative would not provide the balanced community that would occur under the proposed project, since affordable multifamily development would not occur. Neither this alternative nor the proposed project would result in significant unavoidable land use impacts.

Noise

Construction-related noise impacts under this alternative would be similar to the proposed project as the development footprint would be essentially identical, with the exception of

elimination of multifamily development in the southeastern portion of the site. Noise walls and barriers would be needed along internal project streets under this alternative as under the proposed project in order to carry similar, though slightly reduced, levels of traffic. It is anticipated that improvements to Deer Springs Road would be necessary under this alternative, and the construction noise impacts would be similar to those for the proposed project.

Cumulatively significant and unavoidable impacts for noise increase due to project-generated traffic along Buena Creek Road would remain significant and unavoidable under this alternative. This alternative's vehicle trips contribution along Buena Creek Road would be 18,200 ADT, which would remain above the threshold of significance for a cumulative noise increase of more than 3 dB. Therefore, significant and unavoidable noise impacts during operation along Buena Creek Road would be similar to the proposed project.

Traffic

As shown in Figure 5.1-4, access under this alternative would be from Merriam Mountains Parkway and Meadow Park Lane, similar to that under the proposed project. The reduced number of dwelling units under this alternative (1,300 as compared to 2,700) would result in less trip generation than under the proposed project (35,526 ADT compared to 19,060 ADT (approximately 53% of the ADT generated for the proposed project)), but the alternative would result in similar off-site improvements to Deer Springs Road, given the conclusions of the Transportation/Traffic Study that essentially any development on the Merriam site would trigger the requirement to widen Deer Springs Road from 2 to 4 lanes. Under this alternative, direct impacts would not be substantially reduced from the proposed project, but cumulative impacts to intersections and roadway segments would be reduced due to the 47% reduction in total ADT. Overall, the contribution would be somewhat less than what would occur under the proposed project, but impacts would remain significant and unavoidable.

The level of development under this alternative would result in significant unavoidable cumulative traffic impacts along the I-15 mainline freeway and SR 78 ramps as would occur under the proposed project, though the contribution would be less than what would occur under the proposed project.

Hydrology and Water Quality

This alternative would result in less ground disturbance and introduction of fewer impervious surfaces than would occur under the proposed project. Under this alternative, the same water quality measures would be incorporated into the project as would occur under the proposed project, and the quantity and characteristics of runoff exiting the project site would not differ

substantially from those occurring under existing conditions. Neither this alternative nor the proposed project would have significant unavoidable impacts.

Mineral Resources

Under this alternative, the northern portion of the project site zoned for mineral resource extraction would not be designated as biological open space or placed within the development footprint. Although a Specific Plan Amendment would be required to permit mining, the ability to extract mineral resources would not be precluded under this alternative. Impacts to mineral resources would be reduced to a level below significance under this alternative, as mineral resources extraction would not be precluded.

5.5.3 Rationale for Selection of Proposed Project over Alternative D—1300-Unit Reduced Footprint Alternative

This alternative avoids or substantially lessens several significant unavoidable impacts anticipated with the proposed project, including impacts to air quality and mineral resources. It results in reduced impacts to biological resources, and land use, all of which are less than significant for the proposed project. It results in less than significant impacts (similar to the project) to hazards, hydrology, and water quality. Noise and traffic impacts would also be less but would remain significant and unavoidable under this alternative. However, this alternative would not meet project Objectives 1, 2, 3, and 5. This alternative would not include affordable housing and a variety of residential land uses (Objectives 1 and 2). It would not provide enough commercial development to serve both proposed development and broader community needs (Objective 1). The northern portion of the site would not be placed in biological open space; therefore, permanent preservation of 1,192 acres of biological resources would not be assured. The configuration of the 710-acre biological preserve in the southern half of the site would contribute to the draft NCMSCP, but not to the same extent as the project. Therefore, this alternative does not meet the objective (Objective 3) of designing a project that permanently conserves and manages resources in a configuration that contributes to future assembly of a NCMSCP preserve. This alternative would not include recreational trails and outlooks in the northern portion of the project site and therefore would not meet the goal of providing recreational opportunities to the public (Objective 5). As this alternative does not meet a majority of the project objectives, the proposed project is preferred.

5.6 Analysis of Alternative E—GP 2020 Consistent Alternative

5.6.1 Alternative E—GP 2020 Consistent Alternative Description and Setting

Under this alternative, the project site would be developed as anticipated under a draft land use plan for San Diego County's GP 2020. As shown in Figure 5.1-5, this alternative assumes development of rural lands (1 dwelling unit/40 ac) totaling about 64 dwelling units, 50 acres of office professional development, and 15 acres of general commercial development. The development footprint under this alternative assumes planning and entitlement occurring on a lot-by-lot basis, without coordinated construction of a backbone roadway system and other infrastructure. The maximum area of disturbance would be similar to that allowed by GP 2020. The timing of such future development would be unknown as individual property owners would apply and develop their property separately.

5.6.2 Comparison of the Effects of Alternative E—GP 2020 Consistent Alternative to the Proposed Project

Air Quality

This alternative would involve fewer dwelling units (64 as compared to 2,700) and a reduced area of ground disturbance than the proposed project. Under this alternative, multiple entities would grade on a lot-by-lot basis. Commercial uses would increase from 10 acres under the proposed project to 50 acres of office/professional development and 15 acres of general commercial development. Blasting areas would be reduced by about 30% and paved roadway surfaces would be reduced by approximately 70%. It is assumed that the lot-by-lot development approach would avoid mass grading of the site and associated air quality impacts. Based on this assumption, the project would be subject to standard air quality mitigation requirements; therefore, this alternative would likely avoid the direct and cumulative short-term significant construction emissions (PM_{10}, $PM_{2.5}$, NO_X, CO, and VOC) anticipated with the proposed project. GHG emissions under this alternative would be less during construction as a result of the reduction of mass grading.

The reduced number of units would generate less vehicle traffic (23,400 ADT compared to 35,526 ADT) and fewer air emissions. This alternative would comply with the SIP, since it complies with the proposed General Plan. GHG emissions generated during operation would also likely be reduced due to fewer vehicle trips being generated. Therefore, this alternative's long-term operation emissions would avoid the significant air quality impacts of the proposed project.

Aesthetics

The lot-by-lot development approach under this alternative would avoid the mass grading and landform alteration in the residential area as would be anticipated under the proposed project; aesthetic impacts associated with those project-related activities would not occur. Commercial and office/professional development would occur in the southwestern portion of the site under this alternative and would likely be mass graded and visible to motorists passing along Deer Springs Road and I-15. It is assumed that landscape and design features would be incorporated into the alternative to minimize impacts. Under this alternative, visible development would occur along Twin Oaks Valley Road and in the northern portion of the project site, which would not occur under the proposed project. The anticipated character of the development in these areas would be estate lots, which would generally be consistent with the character of the surrounding community. Aesthetic changes under this alternative would be greater than the proposed project in the northern portion of the site, where development would occur in areas identified for biological open space under the proposed project. However, neither this alternative nor the proposed project would have significant unavoidable impacts.

Biological Resources

Impacts to biological resources are somewhat unknown under this alternative, because the levels of conservation and disturbance would depend on the specific development proposal for each lot in the future. It is unknown whether conservation easements would be located on the sensitive portions of individual lots in conjunction with this development approach. Commercial and office/professional development would be located in the area of coastal sage scrub occupied by the California gnatcatcher under this alternative, and it is unknown whether direct impacts to these resources would be avoided in conjunction with development or if an HLP would be processed. It is unlikely that uncoordinated development of individual lots would result in a large biological preserve. Therefore, this alternative would not include a preserve design contributing to assembly of the NCMSCP. However, individual development projects could be required to mitigate and minimize impacts through dedication of on- or off-site habitat. Edge effects throughout the project site would likely be significant and greater than that of the proposed project.

Cultural Resources

Similar to the proposed project, on-site impacts to significant cultural resources would be avoided under this alternative. To the extent that off-site improvements to Deer Springs Road would be required, impacts to significant cultural resources would occur as under the proposed project. Thus, this alternative would result in significant and unavoidable cultural resource impacts resulting from widening Deer Springs Road, similar to the proposed project. However,

this alternative could be combined with Alternative F, which provides an alternate alignment for Deer Springs Road reducing impacts to a level below significance.

Hazards

It is assumed that fire hazards and hazardous materials issues would be addressed on a lot-by-lot basis under this alternative and that conformance with regulations would take place. Fire and emergency access to the area could be within 20 minutes (15 minutes more than the project), assuming that the GP 2020 Public Facilities Element standards are based on existing General Plan response times for 4-acre lots.

Land Use

This alternative would develop the site on a lot-by-lot basis, generally consisting of rural residential land uses with commercial and office/professional development in the southeast portion of the site. This development pattern would generally be consistent with rural residential development in the Twin Oaks Valley Road area but would differ from some of the more urban, master-planned community uses in the City of San Marcos to the south and the Hidden Meadows and Lawrence Welk communities east of I-15. Consistency with environmental plans and ordinances, such as the RPO, the NCMSCP, and the I-15 design guidelines, would need to be determined as development plans are proposed on a lot-by-lot basis.

Noise

The lot-by-lot nature of development anticipated under this alternative would generally reduce construction-related noise impacts. Cumulatively significant and unavoidable impacts for noise that increase due to project-generated traffic along Buena Creek Road would remain significant and unavoidable under this alternative. For near-term cumulative-plus-project noise impacts occurring under the proposed project along Buena Creek Road to be reduced to a level below significance, the ADT along this roadway would need to be reduced to 17,400 ADT or less. The trip contribution under this alternative along Buena Creek Road would be 18,370 ADT, which would remain above the threshold of significance for a cumulative noise contribution increase of more than 3 dB. Therefore, significant and unavoidable noise impacts during operation along Buena Creek Road would be somewhat less but would be significant and unavoidable, similar to the proposed project.

Traffic

The GP 2020 Consistent Alternative would reduce total project ADT by 35% (35,526 ADT compared to 23,400 ADT (approximately 66% of the ADT generated by the proposed project)). It is anticipated that improvements to Deer Springs Road would be triggered by the commercial

development under this alternative, similar to the proposed project. The level of development under this alternative would result in significant unavoidable cumulative traffic impacts along the I-15 mainline freeway and SR 78 ramps, as would occur under the proposed project, though the contribution would be less than what would occur under the proposed project. Under this alternative, direct impacts would not be reduced from the proposed project, but cumulative impacts to intersections and roadway segments would be reduced due to the 34% reduction in total ADT. Overall, the contribution would be somewhat less than what would occur under the proposed project, but impacts would remain significant and unavoidable.

Hydrology and Water Quality

As under the proposed project, it is assumed that water quality measures would be incorporated into individual lot developments. Neither this alternative nor the proposed project would result in significant unavoidable impacts.

Mineral Resources

No features of this alternative would preclude potential future extraction of mineral resources from this project site, although individual lot owners would need to give permission for such activities and the activity would be subject to discretionary land use approvals. As rural residential land uses develop on a lot-by-lot basis on site, potential land use compatibility impacts associated with mineral extraction would increase. Significant unavoidable impacts resulting from the project would be avoided under this alternative, as mineral resource extraction would not be precluded.

5.6.3 Rationale for Selection of Proposed Project over Alternative E—GP 2020 Consistent Alternative

Impacts associated with the intensity of land uses, such as impacts to air quality, noise, and mineral resources, would be greatly reduced or avoided under this alternative. Other impacts, such as impacts to biological resources, may be different under this alternative but would likely be significant. However, this alternative does not meet five of the six project objectives, including 1, 2, 3, 5, and 6: This alternative does not accommodate existing and projected demand for housing and supporting commercial uses, promote a compatible community design, provide for meaningful conservation of biological resources, provide accessible public recreational opportunities, or provide an economically viable planned community. This alternative would not meet the project objectives of developing a master-planned community with a mixture of residential product types along with supporting commercial uses, affordable multifamily units, and neighborhood parks (Objectives 1, 2, and 6). Because of probable lack of cooperation among individual landowners, this alternative would not meet the project objective to permanently

conserve and manage a large habitat block in the Merriam Mountains west of the I-15 and to contribute a meaningful preserve to San Diego County's draft NCMSCP (Objective 3). This alternative would not meet the project objectives to provide recreational opportunities to the public, because trails and outlooks would not be provided (Objective 5). Based on this analysis, the proposed project is therefore preferred.

5.7 Analysis of Alternative F—Off-Site Roadway Improvements along Deer Springs Road

5.7.1 Alternative F—Off-Site Roadway Improvements along Deer Springs Road

The proposed project would include off-site improvements along Deer Springs Road located to the south of the project site. This alternative would eliminate the at-grade alignment of Deer Springs Road. Instead, roadway improvements would include placing 30 ft of surcharged fill over two significant cultural resource sites (CA-SDI-4558 and CA-SDI-9822) near the Mesa Rock Road/Deer Springs Road intersection. Placing a cap over the RPO significant cultural sites would reduce impacts to the primary site area of CA-SDI-9822 and would leave the northern edge of the site within open space. A portion of site CA-SDI-4558 within the Deer Springs Road alignment would be capped, while the remaining site area would be retained in open space. All of the on-site improvements associated with the proposed project would occur regardless of which off-site circulation improvement is implemented.

Deer Springs Road is a County Circulation Element Road and is anticipated to be improved with or without this project. A variety of difficult environmental and engineering challenges are associated with the Deer Springs Road widening in addition to the cultural resources constraints. From an environmental standpoint other constraints include a well developed drainage to the south with mature riparian vegetation; existing noise sensitive land uses including a mobile home park and scattered residential uses further to the west; steep, rocky slopes along the northern portion of the alignment with associated geotechnical and aesthetic challenges; and land use issues associated with maintaining community character and access to existing residences and businesses.

The engineering design challenge is to identify a horizontal and vertical alignment that best balances environmental and physical constraints with the County roadway design standards necessary to construct and maintain a safe and efficient roadway. These design challenges are described and analyzed in the Deer Springs Road alignment study found in Appendix C to the Resource Protection Study (to Appendix F of this EIR). To summarize the analysis, the existing road bisects one cultural site and is adjacent to another significant cultural site. Widening along the existing centerline in either direction would cause additional environmental impacts. When the roadway alignment is shifted to the south away from the cultural sites, it requires the

acquisition and demolition of at least seven existing residences located at the Deer Springs Mobile Home Park and impacts sensitive riparian habitat (see Figure 3.2-1a). When the road is realigned to the north of the sensitive cultural sites, road engineering is infeasible due to the steep terrain of the Merriam Mountains.

As shown in Figures 5.1-6A and 5.1-6B, under this alternative, a retaining wall ranging up to 63 ft high would be constructed along the southern and northern edge of the roadway to raise its elevation. The retaining wall would be constructed as a segmented geo-reinforced wall. It should be noted that this alternative alignment for Deer Springs Road is included due to public interest in avoidance of the cultural resource sites.

5.7.2 Comparison of the Effects of Alternative F—Off-Site Roadway Improvements for Deer Springs Road to the Proposed Project

The alternate alignment of Deer Springs Road would include raising the elevation of the roadway as much as 60 ft in order to cap the two significant cultural sites impacted by the project (CA-SDI-4558 and CA-SDI-9822). Soil required to raise the elevation of the roadway would be transported from the project site located to the north, using excess dirt generated during on-site grading for pads. The additional truck trips during construction to transport fill from the project site would result in increased air pollutant emissions. An increase in PM_{10} from haul trucks traveling along unpaved access roads would also occur under this alternative. Therefore, the additional truck trips during construction under this alternative would result in increased construction-related air emissions that would not occur under the proposed project. Operational impacts would result in similar traffic volumes and related operational air quality impacts compared to the proposed project. GHG emissions under this alternative would be increased during construction, due to additional truck trips being required to transport fill to cap the significant cultural sites and to raise the elevation of the roadway. GHG emissions would be similar to the proposed project, as the roadway capacity would be the same as under the proposed project.

The widening of Deer Springs Road would change the roadway's visual character by increasing the pavement surface (thereby changing the scale of the road) and impacting abutting slopes along the northern portions of the roadway. While grading for roadway improvements along Deer Springs Road would not impact a unique topographic feature or ridgelines, grading for both the alternative and the proposed project would encroach into natural slopes along the northern portion of the roadway. The alternative alignment for Deer Springs Road would require the roadway to be raised as much as 60 feet above the existing pavement. The transitions required to raise the grade of the roadway and descend again to meet the existing at-grade alignment includes a total length of 4,700 feet. The fill required to cap the cultural sites would be approximately 566,000 cubic yards. A retaining wall will need to be constructed along the

southern and northern portions of the roadway, as shown in Figures 5.1-6A and 5.1-6B. The southern retaining wall would be required to raise the elevation of the roadway to cap the cultural resource sites near the intersection of Deer Springs Road and Mesa Rock Road. The retaining walls would be constructed as a segmented geo-reinforced wall that would include plantable cells with vegetation planted along the wall. The northern wall would vary in height from 1 to 14 ft, and the southern retaining wall would vary in height from 2 to 63 ft. Views of the retaining wall west of the mobile home park would be mostly screened by the mature vegetation (consisting of coast live oak woodland) located adjacent to the proposed wall along the drainage channel. Existing views from the mobile home park near the intersection of Deer Springs Road and Mesa Rock Road would be altered from that of mature vegetation to a retaining wall and improvements raising the elevation of the roadway to a maximum of 50 ft in the center. A 6-foot sound wall would also be constructed at grade along the southern perimeter of the roadway near the intersection of Deer Springs Road and Mesa Rock Road, similar to the proposed project. In addition, a retaining wall would be constructed along the northern portion of Deer Springs Road near the intersection of Merriam Mountains Parkway and Deer Springs Road, similar to the proposed project. Views would be altered from that of a hillside with minimal vegetation to a segmented geo-reinforced wall with vegetation in plantable cells along the wall. The plantings would mitigate impacts associated with the wall to less than significant. Neither this alternative nor the proposed project would result in significant and unavoidable impacts to aesthetics.

The total area of ground disturbance under this alternative would not differ from the proposed project. As under the proposed project, this alternative would impact the following sensitive vegetation communities: coastal sage scrub, granitic southern mixed chaparral, non-native grassland, and coast live oak woodland. All sensitive vegetation impacted by roadway improvements would be mitigated in accordance with the project requirements. Overall, biological impacts under this alternative would be similar to the proposed project, and neither this alternative nor the project would have significant unavoidable impacts to biological resources.

Under this alternative, as a result of capping, impacts at two culturally significant sites (CA-SDI-4558 and CA-SDI-9822) would be substantially less than under the proposed project. Under this alternative, minimal disturbance of the sites would occur during construction. Impacts to the culturally significant areas are considered significant but would be mitigated through data recovery. Therefore, Alternative F would substantially lessen significant impacts to cultural resources. Long-term noise impacts associated with vehicle trips from the alternative roadway alignment would not differ from the proposed project. The proposed project and alternative alignment of Deer Springs Road would both require a 6-foot sound wall to mitigate for the off-site traffic noise increase along Deer Springs Road adjacent to the mobile home park. Therefore, under this alternative, long term impacts would be similar to those for the proposed project.

Noise would be generated during construction of the roadway through grading for the proposed alignment of the roadway improvements. To accommodate the proposed capping and elevation of the roadway over two cultural resource sites, a retaining wall would need to be constructed adjacent to the mobile home park near the intersection of Deer Springs Road and Mesa Rock Road. Constructing the segmented geo-reinforced wall adjacent to the mobile home park would include excavating a shallow trench in which to place gravel serving as the foundation for the wall base. The wall would then be raised by placing geo-grid fabric to serve as the base for each additional layer of the wall. The wall would consist of interlocking segments placed on top of one another to form the wall. Near the intersection of Merriam Mountains Parkway and Deer Springs Road, the roadway widening would occur within approximately 20 ft of existing mobile home residences. At this distance, the combination of larger equipment, such as a scraper, grader, paving equipment, roller compactor, and water truck, would generate a 1-hour average noise level of approximately 80 dB. The construction activities would occur for approximately 3 to 4 months adjacent to the mobile home park area. Therefore, during the widening of Deer Springs Road, the project would result in a significant unavoidable short-term construction noise impact at approximately five existing residences located along the south side of Deer Springs Road near Merriam Mountains Parkway.

In addition, construction noise would not comply with the County of San Diego noise ordinance due to noise levels exceeding the allowable noise levels during construction, similar to the proposed project. Due to the proposed alignment conflicting with the County of San Diego noise ordinance, a variance is required per Section 36.423 for construction noise.

Potential mitigation measures were explored to minimize impacts from construction-related noise; however, noise impacts during construction could not be reduced to a level below significance. For example, the construction of a temporary noise barrier during construction was determined not to be feasible because the slope would constantly be increasing in height as the fill material was placed. Therefore, under this alternative, as under the proposed project, construction noise impacts associated with construction of Deer Springs Road would exceed the County of San Diego noise ordinance and a variance is required.

5.7.3 Rationale for Selection of Proposed Project over Alternative F—Off-Site Roadway Improvements along Deer Springs Road

Under this alternative, the roadway design would include placing fill over two significant cultural resource sites in order to cap the cultural resources located near the intersection of Deer Springs Road and Mesa Rock Road. This alternative would result in minimal disturbance of the cultural sites during construction, which would be mitigated to less than significance through data recovery. This alternative would result in short-term significant and unavoidable noise impacts during construction of Deer Springs Road, due to construction activities occurring

immediately adjacent to residences located at the mobile home park. Construction noise adjacent to the mobile home park would exceed the County of San Diego Noise Ordinance criterion of 75 dB during construction and a noise variance during construction of Deer Springs Road would be required. In addition, this alternative would also result in greater air pollutant emissions during construction than would occur under the proposed project. Implementation of the capping alternative will also be substantially more costly than the at-grade alternative because of the increased cost for grading, retaining walls, and construction of a 20-foot by 24-foot by 450-foot tunnel that would be necessary to provide access to the CWA line that crosses Deer Springs Road approximately 1,500 feet west of site CA-SDI-9822. These additional costs for the capping alternative would be included in the County's TIF program. Because this alternative would result in a significant and unavoidable noise impact during construction, and increased air quality impacts, the proposed project's design for this road is preferred.

5.8 Analysis of Alternative G—Deer Springs Road Alignment to Avoid Residence at 1088 Deer Springs Road

5.8.1 Alternative G—Deer Springs Road Alignment to Avoid Residence at 1088 Deer Springs Road: Description and Setting

This alternative incorporates the project as proposed and analyzed in this EIR with the addition of a refinement to the project-level alignment of a portion of the off-site improvements to Deer Springs Road in the vicinity of a house under construction at 1088 Deer Springs Road (see Figure 5.8-1A). The revised alignment is between Stations 23+20 and 53+75 and extends along an approximately 3,055-foot reach of the Deer Springs Road off-site improvements. The remainder of the Deer Springs Road off-site alignment would remain as depicted and analyzed for the proposed project in this EIR (see Figures 1.1-15A and 1.1-15B).

This alternative is proposed to address a comment received during public review of the REIR. Comment Letter R52 to the REIR identifies a house under construction located partially within the proposed alignment of the off-site Deer Springs Road improvements as proposed by the project analyzed in this EIR. This alternative, Alternative G, would revise the alignment in this area to avoid disturbance to the home under construction at 1088 Deer Springs Road. In order to implement this alternative, a design exception would be required. A design modification request was submitted by the project applicant to the County Department of Public Works (DPW) that proposes a deviation from the right-of-way and pavement width County public road standard. A design modification would be necessary to avoid taking the home at 1088 Deer Springs Road. For the six-lane future improvement, it would not be possible to maintain a standard Prime Arterial cross-section of 134 feet, accommodate the constraints associated with the County Water Authority easement to the south of the proposed alignment, and avoid the home. DPW conditionally approved the revised alignment and a reduced cross-section width on August 6,

2009, provided the property owner states they will not oppose a median restriction if DPW determines it is necessary. The result would be reduced median and shoulder widths in order to accommodate the future six-lane condition within 110 feet of right of way.

Alternative G would shift the centerline of the roadway to the south (35 feet maximum) to ensure avoidance of the residence under construction. As shown on Figure 5.8-1A, under this alternative, a retaining wall extending for approximately 1,115 feet and ranging in height from 5 to 21 feet high would be constructed along the southern edge of the roadway to raise the roadway elevation to accommodate the County Water Authority easement. The retaining wall would be constructed as a segmented geo-reinforced wall. The alignment under this alternative would reduce the maximum cut-slope height along the northern limits of the roadway by approximately 25 feet; from 205 feet with the proposed project to 180 feet with the revised alignment. The required earthwork would also be reduced under this alternative by approximately 100,000 cubic yards as a result of the reduced grading footprint required along the northern limits of the roadway. As under the proposed project, this alternative will not require the need for imported fill and/or export as a balanced cut/fill operation will be maintained as part of the construction activities.

The revised alignment has been included as a project alternative for the decision makers to consider in the event it is determined that avoidance of the house under construction should be included as part of the proposed project.

5.8.2 Comparison of the Effects of Alternative G—Off-Site Roadway Improvements along Deer Springs Road - Avoidance of Residence at 1088 Deer Springs Road.

Air Quality

As noted above, under this alternative there would be an overall reduction in 100,000 cubic yards of earthwork. This would result in an overall reduction in construction trips to transport cut material to the project site to be used as fill for pad sites. It is anticipated there would be an overall reduction in PM_{10} from haul trucks traveling along unpaved access roads under this alternative with an overall slight decrease in construction-related air emissions when compared with the proposed project. As under the proposed project, mitigation measures to reduce air emissions during construction (see Section 2.1.6) would be implemented as part of the roadway construction. Even though mitigation measures in Section 2.1.6 would be utilized during construction and the required earthwork will be reduced by approximately 100,000 cubic yards, significant and unmitigated direct and cumulative construction emissions (PM_{10}, $PM_{2.5,}$ NO_X, CO, and VOC) would remain as identified under the proposed project. Similar to the project, construction emission impacts would remain significant and unmitigated because measures to reduce emissions below a level of significance were determined to be infeasible (Section 2.1.7).

Alternative G consists of a revised alignment for off-site improvements along Deer Springs Road and does not propose a change in land uses that would alter the ADT and associated vehicular emissions. Since this alternative does not result in a change in traffic volumes and/or land uses from the proposed project, operational air quality impacts would be the same as identified under the proposed project. Therefore, neither this alternative nor the project would have significant unavoidable air quality operational impacts.

Aesthetics

The retaining wall along the southern portion of the roadway would be located within the proposed right-of-way and be constructed as a segmented geo-reinforced wall that would include plantable cells with vegetation planted along the wall. Views of the retaining wall for private residences located to the south would be mostly interrupted due to mature vegetation consisting of coast live oak woodland associated with an existing drainage located adjacent to the proposed wall. Views would be altered from that of a hillside with minimal vegetation to a segmented geo-reinforced wall with vegetated plantable cells. The visual change would not be substantial as the retaining wall would include vegetation planted along the face of the wall and views of the retaining wall would be screened by existing mature vegetation.

While grading for roadway improvements along Deer Springs Road would not impact a unique topographic feature or ridgelines, grading for both the alternative and the proposed project would encroach into natural slopes along the northern portion of the roadway. With the proposed alignment shift to the south, a reduced maximum slope height and cut slope would be needed when compared with the proposed project analyzed in this EIR. The slope height would be reduced from a maximum of 205 to 180 feet, which would result in a reduction of 1.4 acres of overall ground disturbance along the northern portion of the roadway when compared with the proposed project. The alignment of the roadway under this alternative would also be shifted to the south, resulting in an additional 0.5 acre of impact to the south in comparison to the proposed project. Therefore, under this alternative, there would be an overall net reduction in grading footprint of 0.9 acre when compared with the proposed project. As under the proposed project, mitigation measures to reduce impacts to the intactness/unity and visual character for passing motorists that may result from construction of the roadway (see Section 3.1.6) would be implemented as part of the Deer Springs Road improvements. The potential visual impacts resulting from construction of Deer Springs Road would be reduced to below a level of significance as identified under the proposed project.

Under this alternative, a sound wall would be required for a distance of approximately 260 feet adjacent to the 1088 Deer Springs Road location within the proposed right-of-way. The sound wall would vary in height from 8 to 10 feet, as seen on Figure 5.8-1A. Existing views to the north for motorists consist of disturbed habitat immediately adjacent to the roadway with

chaparral and eucalyptus vegetation further from the roadway. Views of Deer Springs Ridge are also available for motorists at the proposed location of the sound wall. The construction of the sound wall would change views from those of disturbed habitat and chaparral vegetation to an 8- to 10-foot sound wall with a total length of approximately 260 feet. The proposed sound wall would alter only short-range views for motorists looking northward, and distant views of Deer Springs Ridge would be maintained. Views of the sound wall for passing motorists would be available for approximately 3 to 25 seconds, depending on traffic conditions and based on the design speed of 45 to 55 miles per hour (mph). While views of distant vistas would not be obstructed by the sound wall along this section of Deer Springs Road the sound wall may contrast with the visual environment through construction of a new element along the roadway. As under the proposed project, mitigation measures to reduce impacts to the intactness/unity and visual character for passing motorists that may result from construction of sound walls (see Section 3.1.6) that would be implemented as part of the Deer Springs Road improvements. With implementation of the mitigation measures described in M-AE-3a through M-AE-3e, impacts to vividness/intactness/unity and visual character associated with the Deer Springs Road improvements would be reduced to a level below significance.

Biological Resources

The total area of ground disturbance under this alternative would be reduced by approximately 1.4 acres along the northern portion of the roadway, which consists of southern mixed chaparral; coastal sage-chaparral scrub and disturbed coastal sage-chaparral scrub (see Figure 5.8-1B). The roadway improvements under this alternative would result in an increase of 0.5 acre to the south, which consists of urban/developed habitat (see Figure 5.8-1B). This would result in an overall reduction in ground disturbance of 0.9 acre when compared with the proposed project. The construction would be completed within the proposed grading limits without additional disturbance for temporary access. As under the proposed project, this alternative would impact sensitive vegetation communities consisting of coastal sage chaparral scrub (1.9 acres as opposed to 2.0 acres under the proposed project), disturbed coastal sage chaparral scrub (0.4 acres as opposed to 0.8 acres under the proposed project) and southern mixed chaparral (4.1 acres as opposed to 5.0 acres under the proposed project) within the roadway construction area. This alternative would result in the same impacts to coast live oak woodland as identified under the proposed project (0.1 acres). The sensitive vegetation impacted by roadway improvements would be mitigated in accordance with the project requirements as seen in Section 3.2.6 and summarized below is Table 5.8-1. Overall, biological impacts under this alternative would be reduced in comparison to the proposed project as there would be a 0.9-acre reduction in ground disturbance. With implementation of the required mitigation for coastal sage chaparral scrub, southern mixed chaparral and coast live oak woodland, impacts would be reduced to a level below significance as identified under the proposed project.

Cultural Resources

Under this alternative, the disturbance that would occur at the two culturally significant sites (CA-SDI-4558 and CA-SDI-9822) for improvements completed along Deer Springs Road would be reduced in comparison to the proposed project. The roadway alignment would be shifted to the south, which results in a reduced disturbance area along the northern portion of the roadway. This shift to the south will reduce disturbance to the cultural sites by approximately 3,300 square feet on the north side of the road. Since the roadway will be shifted to the south it will result in additional disturbance of approximately 2,600 square feet along the southern portion of the roadway. This change in alignment would result in an overall net reduction of approximately 700 square feet to the cultural sites in comparison to the proposed project. As under the proposed project, mitigation measures to reduce impacts both during construction and for long-term management of the sites (see Section 2.5.6) would be implemented as part of the Deer Springs Road improvements. Even with the reduced disturbance under this alternative and implementation of the mitigation measures in Section 2.5.6, impacts to the culturally significant sites are expected to remain significant and unavoidable as identified under the proposed project.

Hazards

Impacts to hazards under this alternative would neither increase nor decrease compared to the proposed project, based on the assumption that standard County of San Diego requirements and regulations for hazardous materials would be implemented. The mitigation measures provided in Section 3.3 will be implemented with this alternative as under the proposed project. With implementation of the mitigation measures described in Section 3.3 and following standard County of San Diego requirements, impacts would be reduced to a level below significance as under the proposed project.

Land Use

This alternative roadway alignment does not propose alternate land uses and would result in a slight shift of the roadway to the south (a maximum of 35 feet) to avoid taking the house located at 1088 Deer Springs Road. Therefore, the land use compatibility and community character impacts under this alternative would be as described under the proposed project. Since this alternative does not result in a change in proposed land uses from the proposed project, land use impacts would not differ in comparison to the proposed project. Therefore, neither this alternative nor the project would have significant unavoidable impacts.

Noise

Under this alternative, and assuming completion of the house currently under construction at 1088 Deer Springs Road, the new home would be regarded as a sensitive receptor and would be affected by mobile traffic noise along Deer Springs Road. These effects were analyzed assuming existing-plus-project-plus-cumulative traffic along the roadway. The analysis concludes that there would be a noise-level increase up to 10 dB at the 1088 Deer Springs Road location. The calculated existing and future noise levels at the house under construction are depicted in Table 5.8-2. The project's portion of direct and cumulative traffic noise would be significant (Impact ALT-G- NOI-1).

With incorporation of mitigation measure M-ALT-G-NOI-1, noise modeling and calculations indicate that noise barriers would reduce noise levels to a level below significance (see Table 5.8-2). Under this alternative and as with the proposed project, with construction of required sound walls as identified in M-NOI-8 and M-ALT-G-NOI-1, long-term operational noise impacts would be reduced to a level below significance.

M-ALT-G- NOI-1 A permanent noise barrier approximately 8 to 10 feet in height will reduce noise that affects identified sensitive receptors so that the noise level increase does not exceed the existing conditions or the significance threshold standards (see Table 5.8-2). The location of the noise barrier is based on preliminary road improvement design plans and is depicted on Figure 5.8-1A. The applicant will construct the required permanent noise barriers as part of the construction improvements along Deer Springs Road to reduce cumulative noise impacts to off-site receptors.

Traffic

Alternative G consists of a revised alignment for off-site improvements completed along Deer Springs Road and does not propose a change in land uses that would alter the ADT generated from the proposed land uses. Since this alternative does not result in a change in ADT from the proposed project, impacts would not differ from those identified under the proposed project. Therefore, under this alternative, the same traffic mitigation measures would be required and significant and unavoidable impacts would remain as under the proposed project.

Hydrology and Water Quality

This alternative would result in the same ground disturbance as under the proposed project. Therefore, under this alternative, the quantity and characteristics of runoff generated from roadway improvements would not differ from the proposed project. As under the proposed

project, mitigation measures to reduce impacts to hydrology and water quality (see Section 3.4.6) would be implemented as part of the Deer Springs Road improvements. With implementation of the mitigation measures described in Section 3.4.6, impacts to hydrology and water quality associated with the Deer Springs Road improvements would be reduced to a level below significance.

Mineral Resources

As under the proposed project, this alternative roadway alignment would not be located in areas identified as high value for mineral resource extraction (MRZ-2) and would not result in impacts to mineral resources. However, as under the proposed project, the development footprint would be located in areas identified as high value for mineral resource extraction. Therefore, significant and unavoidable impacts would remain as under the proposed project.

5.8.3 Rationale for Selection of Alternative G over the Proposed Project—Off-Site Roadway Improvements along Deer Springs Road - Avoidance of Residence at 1088 Deer Springs Road.

This off-site Deer Springs Road improvement alternative is environmentally preferred to the proposed project because the roadway alignment reduces impacts without increasing any impacts and is preferred by the project applicant. The improvement alternative is preferred because it would avoid taking the house under construction at 1088 Deer Springs Road if the alignment is determined to be feasible. The revised alignment of Deer Springs Road would also reduce environmental impacts for the following: (1) Aesthetics – reduced grading footprint for the proposed cut slope near Merriam Mountains Parkway, which results in reduced visual effects; (2) Biological Resources – net reduction in impacts to sensitive vegetation communities due to a reduced grading footprint (3) Air Quality – a decrease in construction emissions as a result of a reduced grading footprint and (4) Cultural Resources – net reduction in impact to a significant cultural site.

5.9 Environmentally Superior Alternative

CEQA requires designation of an "environmentally superior alternative." Alternative A, the No Project/No Development Alternative, would avoid or reduce all of the significant unavoidable environmental impacts of the proposed project. It is therefore environmentally superior to the project. However, if the environmentally superior alternative is the No Project Alternative, Section 15126.6(e)(2) of the State CEQA Guidelines requires the EIR to identify an environmentally superior alternative among the remaining alternatives (14 CCR 15000 et seq.).

Among the remaining development alternatives, the 785-Unit Reduced Footprint Alternative (Alternative C) is considered to be the environmentally superior alternative, because it avoids the significant unavoidable impacts of the project on air quality, mineral resources, and noise. If combined with the Off-Site Roadway Improvements along Deer Springs Road (Alternative F), Alternative C would also avoid the significant unavoidable impacts of the project on cultural resources. Alternative C would reduce project traffic but would not substantially lessen or avoid substantial unavoidable impacts on the I-15 freeway mainline and SR 78 ramps.

Although Alternative C has somewhat fewer direct environmental impacts, the proposed project is environmentally preferred because it offers permanent preservation of the 1,192-acre Biological Open Space in accordance with the NCCP. The project's contribution to the proposed NCMSCP preserve is approximately double the size of the preserve associated with Alternative C and will include permanent funding for preservation and management.

However, Alternative C does not achieve project objectives of providing affordable housing (Objective 1), a variety of residential land uses (Objective 2), and accessible public recreational opportunities (Objective 5). Although Alternative C provides for meaningful conservation of biological resources through preservation of 810 acres of habitat (Objective 3), it does not achieve the objective to the extent of the proposed project, which preserves more than 1,192 acres of habitat in a more desirable configuration.

The project therefore provides a desirable balance of housing, commercial development, recreational open space, and biological open space, which achieves project objectives to a much greater degree than Alternative C.

TABLE 5.1-1
Comparison of Significant Unavoidable Impacts to Air Quality, Traffic, Mineral Resources, Noise, and Cultural Resources under the Proposed Project with Impacts of Alternatives for Those Environmental Categories

Environmental Issue	Proposed Project (2,700 du and commercial)	ALTERNATIVE B No Project/Existing General Plan (345 du, 3.5 acres commercial, 27.2 acres industrial)	ALTERNATIVE C 785-Unit Reduced Footprint Alternative (785 du, 5 acres commercial)	ALTERNATIVE D 1300-Unit Reduced Footprint Alternative (1300 du, 5 acres commercial)	ALTERNATIVE E GP 2020 Consistent (64 du, 50 acres office professional, 15 acres general commercial)	ALTERNATIVE F Off-Site Roadway Improvements along Deer Springs Road	ALTERNATIVE G Deer Springs Road Alignment to Avoid Residence at 1088 Deer Springs Road
Air Quality Construction	Significant and Unavoidable:	Significant but Mitigated to Less than Significant	Significant but Mitigated to Less than Significant	Significant but Mitigated to Less than Significant	Significant but Mitigated to Less than Significant	Assume proposed project	Same as Project
Traffic	Significant and Unavoidable: 35,526 ADT	Significant and Unavoidable: 13,780 ADT	Significant and Unavoidable: 13,780 ADT	Significant and Unavoidable: 19,060 ADT	Significant and Unavoidable: 23,400 ADT	Assume proposed project	Same as Project
Mineral Resources	Significant and Unavoidable: Precludes ability for future mineral resources extraction	Less than Significant[1]	Less than Significant[1]	Less than Significant[1]	Less than Significant[1]	Assume proposed project	Same as Project
Noise Construction	Significant and Mitigated (on site) Significant and Unavoidable (off site)	Significant but Mitigated to Less than Significant (on site) Significant and Unavoidable (off site)	Significant but Mitigated to Less than Significant (on site) Significant and Unavoidable (off site)	Significant but Mitigated to Less than Significant (on site) Significant and Unavoidable (off site)	Significant but Mitigated to Less than Significant(on site) Significant and Unavoidable (off site)	Assume proposed project	Slightly Less than Project
Operations	Direct – Significant but Mitigated to Less than Significant Cumulative - Significant and Unavoidable	Direct and Cumulative – Significant but Mitigated to Less than Significant[2]	Direct and Cumulative – Significant but Mitigated to Less than Significant[2]	Direct – Significant but Mitigated to Less than Significant Cumulative – Significant and Unavoidable	Direct – Significant but Mitigated to Less than Significant Cumulative – Significant and Unavoidable	Assume proposed project	Slightly More than Project
Cultural Resources	Significant and Unavoidable[3]	Significant and Unavoidable[3]	Significant and Unavoidable[3]	Significant and Unavoidable[3]	Significant and Unavoidable[3]	Significant but Mitigated to Less than Significant	Slightly Less than Project

Notes:
Alternative A (No Project/No Development) is not included above, as all significant and unavoidable impacts identified for the proposed project would be reduced to a level below significance.
[1] MRZ-2 areas could be developed under this alternative or could be proposed for mineral extraction; therefore, mineral resources extraction would not be precluded under this alternative.
[2] Under this alternative, cumulative traffic levels along Buena Creek Road would be reduced to 17,400 ADT from the 20,000 ADT anticipated under the proposed project, reducing the increase in ambient noise levels along the roadway from 4 dB to 3 dB. This 1 dB reduction in increased noise levels would avoid the significant and unavoidable cumulative noise impact identified for the proposed project.
[3] For any development to occur on the Merriam site, improvements would be required along Deer Springs Road. Land use alternatives (B through E) assume the alignment of the roadway would include the alignment identified for the proposed project. Therefore, impacts to cultural resources are identified as significant and unavoidable, similar to the proposed project. If the land use alternative is developed with the alternative alignment of the roadway (Alternative F), impacts to cultural resources would be reduced to a level below significance with mitigation.

TABLE 5.8-1
Alternative G —Deer Springs Road Vegetation Communities

Vegetation Type	Proposed Project (acres)	Alternative G (acres)	Mitigation Ratios	Mitigation Requirement (Proposed Project)	Mitigation Requirement (Alternative G)
Urban/Developed	3.0	3.5	0	0.0	0.0
Coastal Sage Chaparral Scrub	2.0	1.9	2:1	4.0	3.8
Disturbed Coastal Sage Chaparral Scrub	0.8	0.4	2:1	1.6	0.8
Southern Mixed Chaparral	5.0	4.1	0.5:1	2.5	2.0
Coast Live Oak Woodland	0.1	0.1	3:1	0.3	0.3

TABLE 5.8-2
Existing and Future CNEL at 1088 Deer Springs Road

Sound Level Measurement Locations (see Figure 5.8-1)	Existing	Existing + Project[1]	Existing + Project + Cumulative[2]	Noise Level Increase[3]	Mitigated Noise Level
A	70	74	75	5	72
B	65	74	75	10	67

Notes:
[1] Existing Plus Project Traffic Volumes; 4-Lane Deer Springs Road
[2] Existing Plus Project Plus Cumulative Projects Traffic Volumes; 4-Lane Deer Springs Road
[3] Existing Plus Project Plus Cumulative Projects
Bold = Exceeds Significance Threshold
Sound levels rounded to the nearest whole dB CNEL
The existing + project, existing + project + cumulative, and mitigated noise levels incorporate the realignment and widening of Deer Springs Road

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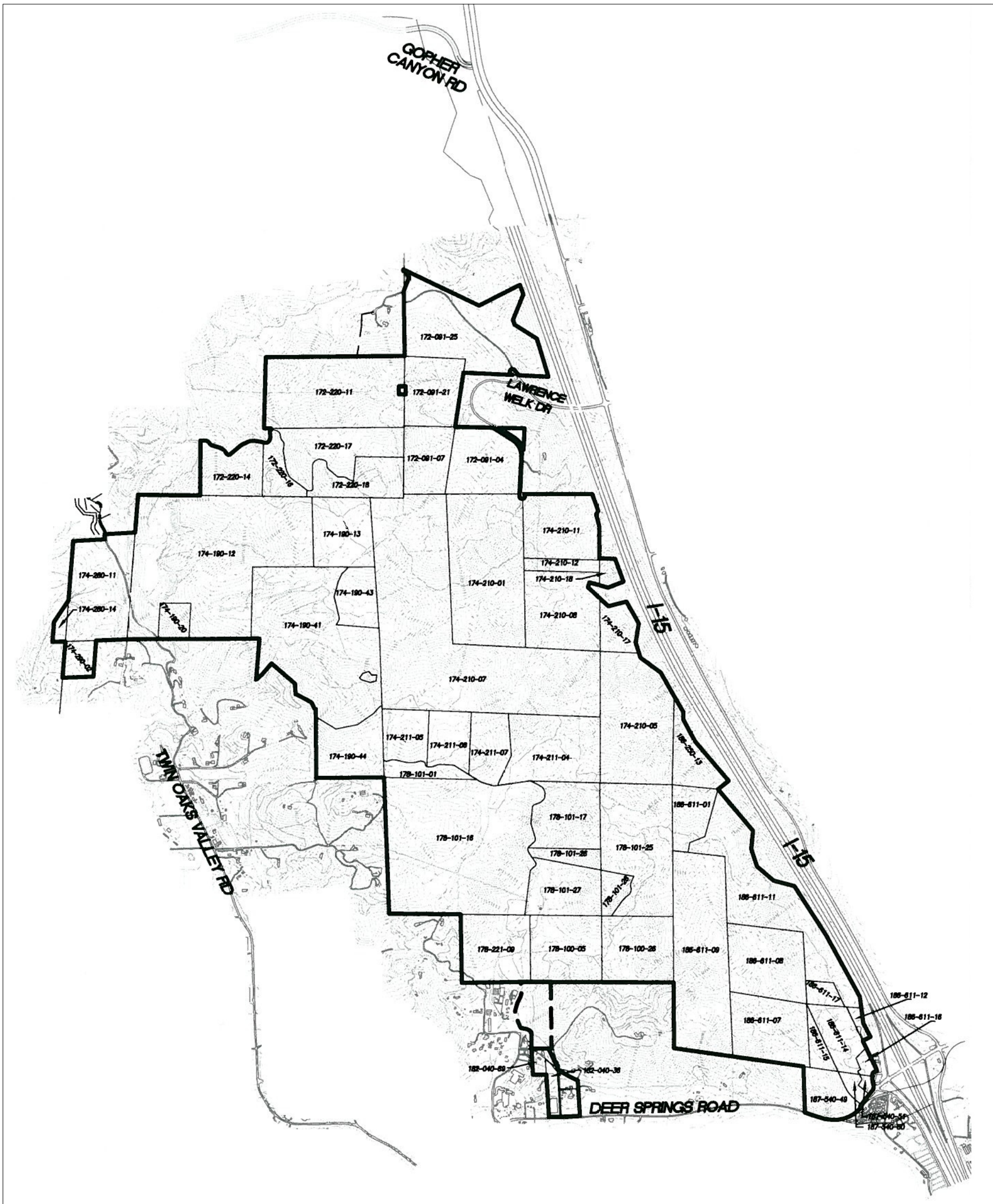


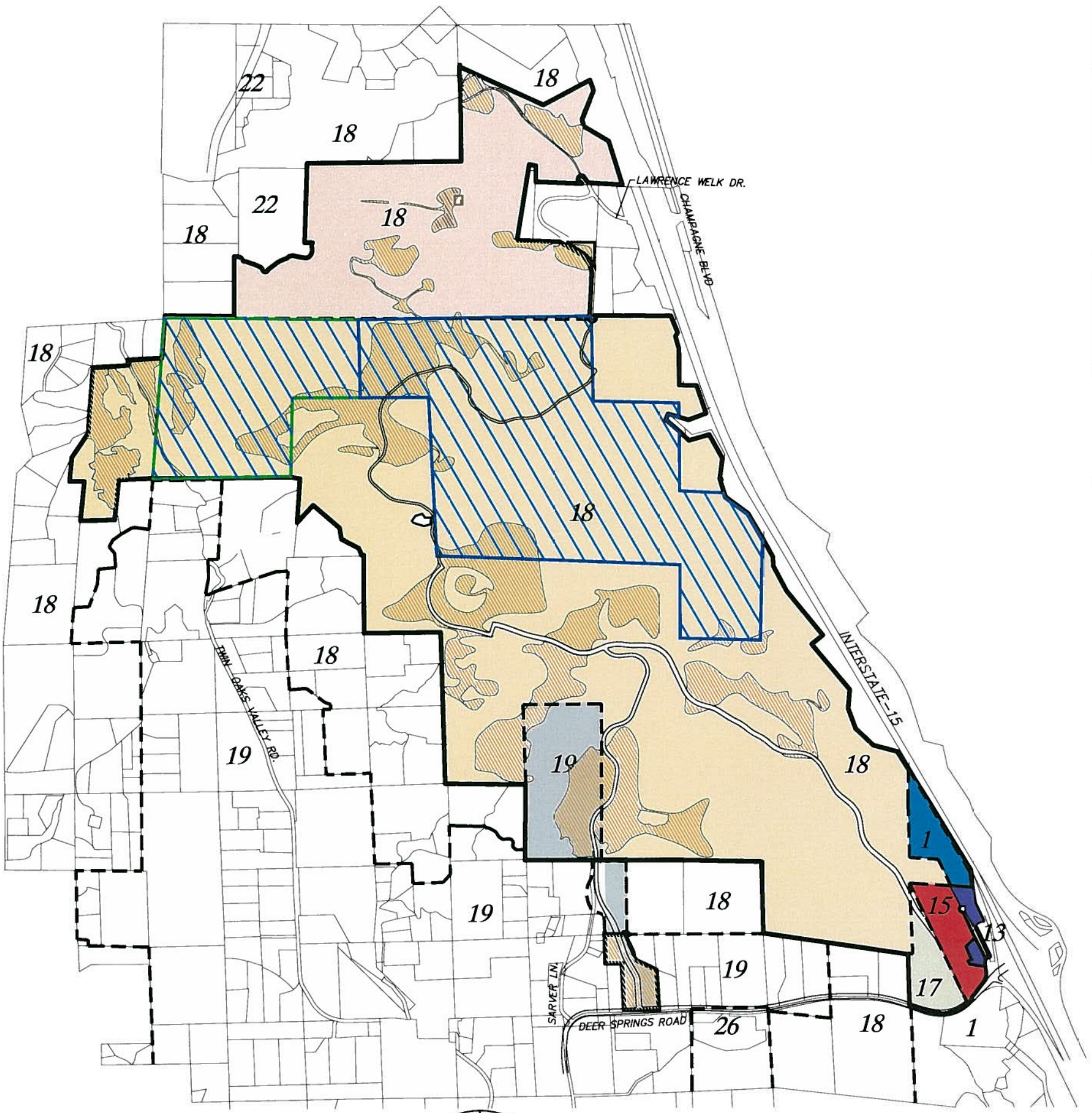
SOURCE: FUSCOE ENGINEERING

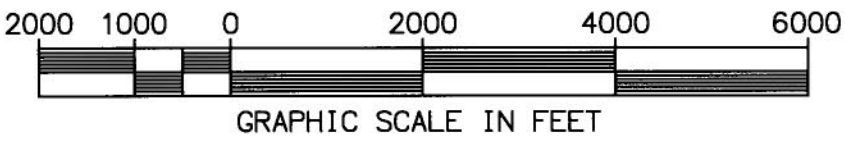
Alternative A - No Project / No Development Alternative

FIGURE 5.1-1

MERRIAM MOUNTAINS SPECIFIC PLAN EIR

N





DEVELOPMENT FOOTPRINT

MRZ OVERLAY

MINERAL RESOURCE ZONE 2

MINERAL RESOURCE ZONE 2A

COMMERCIAL	3.5 ACRES
INDUSTRIAL	27.2 ACRES
RESIDENTIAL	2,296.3 ACRES
TOTAL:	2,327 ACRES

	DEVELOPMENT IN MRZ			NO DEVELOPMENT IN MRZ		
	ACRES	PARCELS	DU'S	ACRES	PARCELS	DU'S
1. NORTH COUNTY METRO C.P. RESIDENTIAL (1 D.U. / 1, 2 & 4 ACRE MIN.)	21.0	1	2	21.0	1	2
13. GENERAL COMMERCIAL	3.5	2	-	3.5	2	-
15. NORTH COUNTY METRO C.P. INDUSTRIAL	27.2	2	-	27.2	2	-
17. NORTH COUNTY METRO C.P. ESTATE RESIDENTIAL (1 D.U. / 2 & 4 ACRE MIN.)	25.2	2	6	25.2	2	6
18. NORTH COUNTY METRO C.P. MULTIPLE RURAL USE (1 D.U. / 4,8 & 20 ACRE MIN.)	1,789.9	40	221	1,121.5	29	138
18. BONSALL COMMUNITY PLAN, ESTATE RESIDENTIAL (1 D.U. / 4,8 & 20 ACRE MIN.)	375.0	9	96	375.0	9	96
19. NORTH COUNTY METRO C.P. INTENSIVE AGRICULTURE (1 D.U. / 2, 4 & 8 ACRE MIN.)	82.4	2	20	82.4	2	20
26. VISITOR SERVING COMMERCIAL						
TOTAL:			345			262

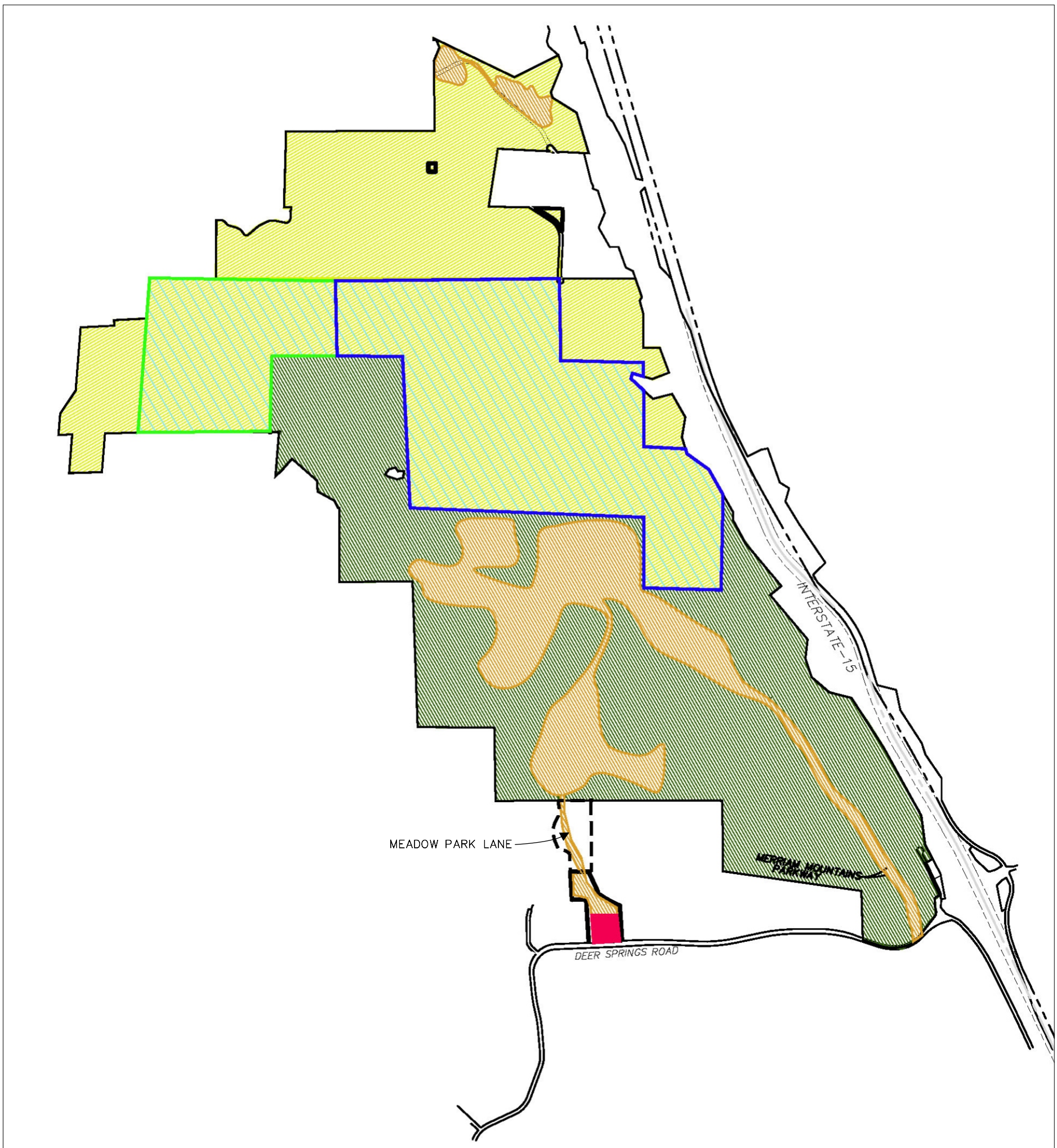
SOURCE: FUSCOE ENGINEERING

Alternative B - No Project / Existing General Plan Alternative

FIGURE 5.1-2

MERRIAM MOUNTAINS SPECIFIC PLAN EIR

N



DWELLING UNIT COUNT: 785DU
DEVELOPMENT AREA: 350 ACRES
(INCLUDING 5.0 ACRES OF COMMERCIAL)

MINERAL RESOURCE ZONE 2

MINERAL RESOURCE ZONE 2A

DEVELOPMENT FOOTPRINT

COMMERCIAL FOOTPRINT

BIOLOGICAL OPEN SPACE

FUTURE PLANNING AREA

MRZ OVERLAY

SCALE: 1"=2000'

2000 1000 0 2000 4000 6000

GRAPHIC SCALE IN FEET

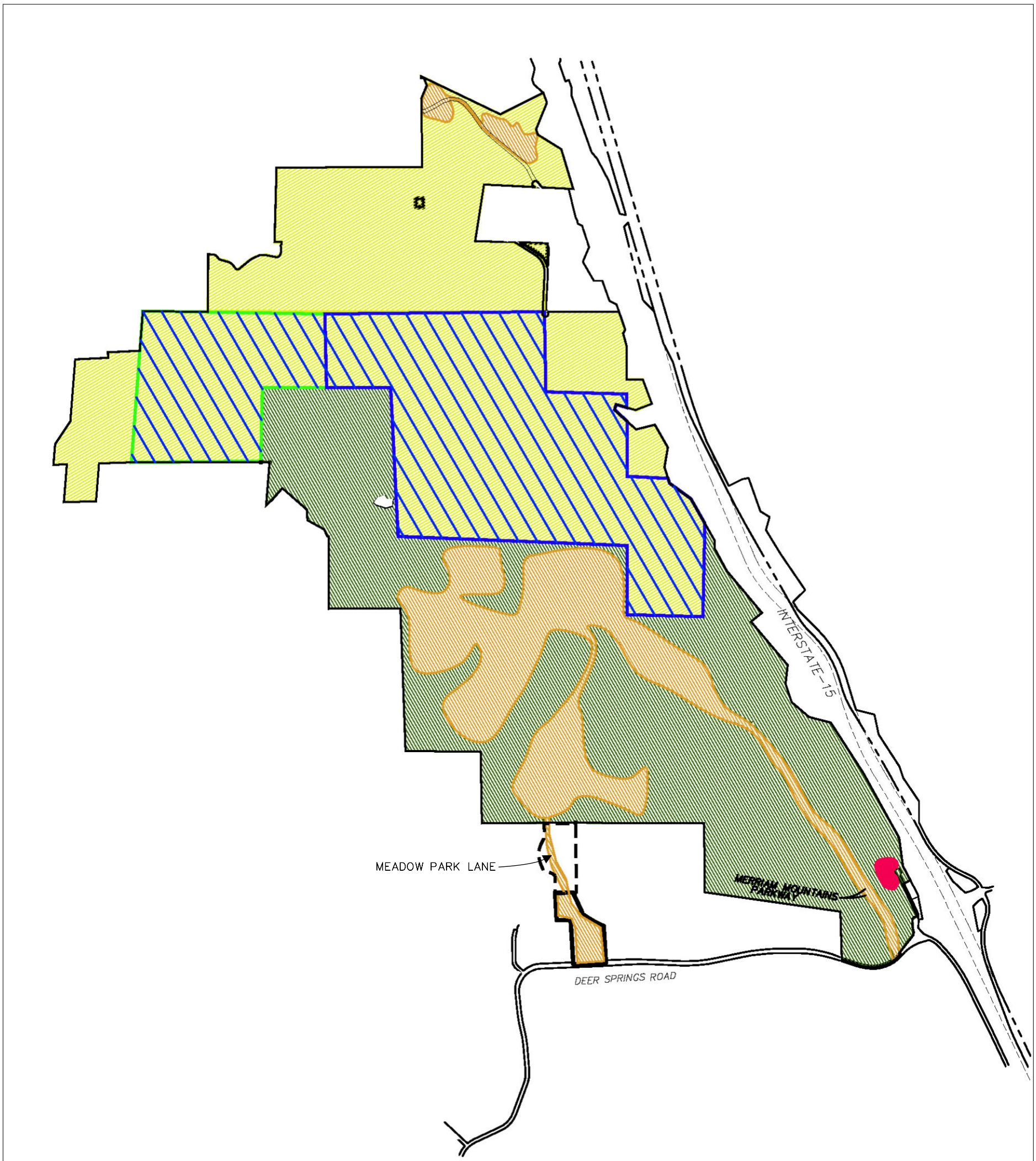
SOURCE: FUSCOE ENGINEERING

Alternative C - 785-Unit Reduced Footprint Alternative

FIGURE 5.1-3

MERRIAM MOUNTAINS SPECIFIC PLAN EIR

N



DWELLING UNIT COUNT: 1,300 DU
DEVELOPMENT AREA: 450 ACRES
(INCLUDING 5.0 ACRES OF COMMERCIAL)

MINERAL RESOURCE ZONE 2
MINERAL RESOURCE ZONE 2A

DEVELOPMENT FOOTPRINT
COMMERCIAL FOOTPRINT
BIOLOGICAL OPEN SPACE
FUTURE PLANNING AREA
MRZ OVERLAY

SCALE: 1"=2000'

2000 1000 0 2000 4000 6000

GRAPHIC SCALE IN FEET

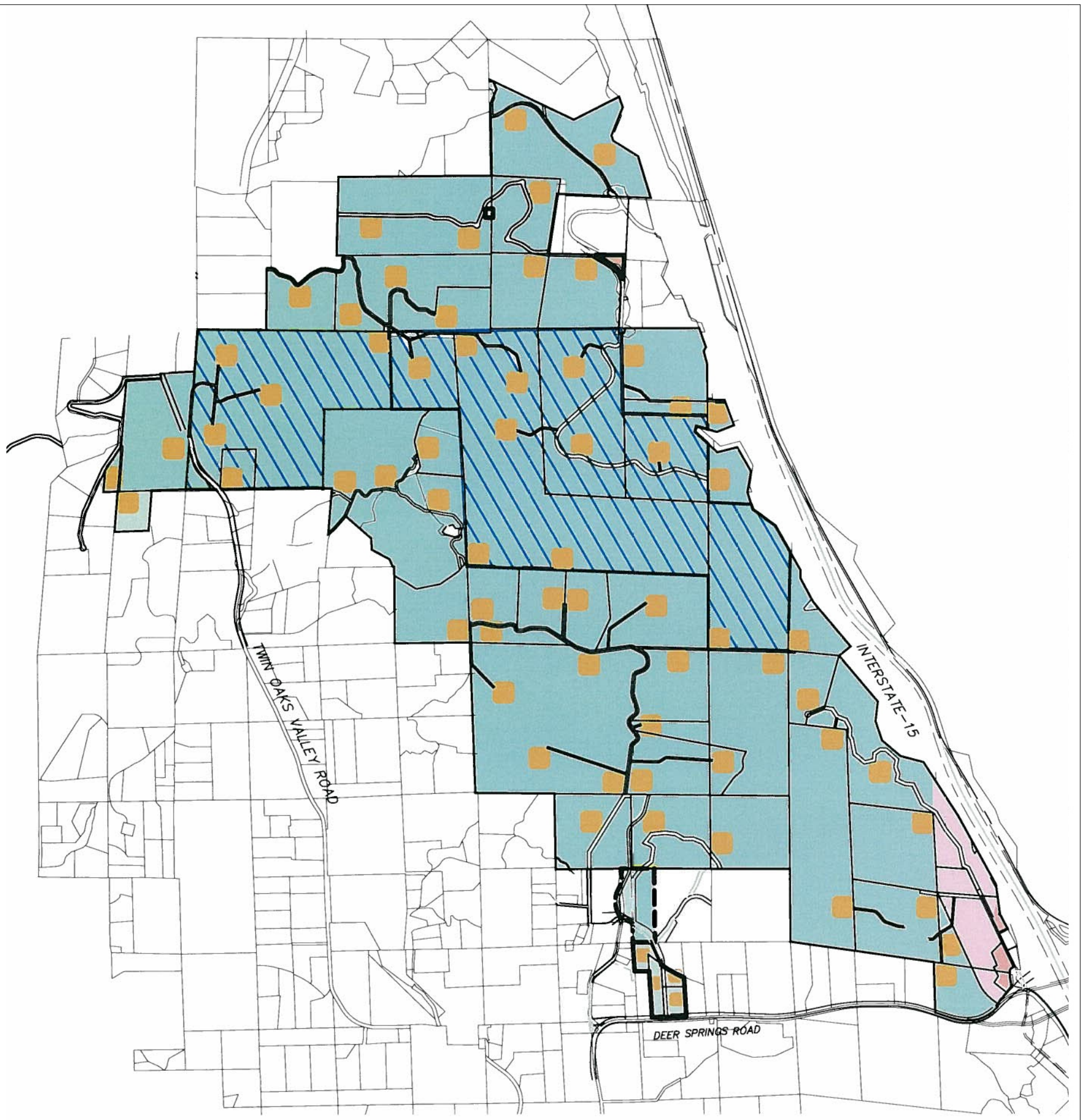
SOURCE: FUSCOE ENGINEERING

Alternative D - 1300-Unit Reduced Footprint Alternative

FIGURE 5.1-4

MERRIAM MOUNTAINS SPECIFIC PLAN EIR

N



2000 1000 0 2000 4000 6000

GRAPHIC SCALE IN FEET

DEVELOPMENT FOOTPRINT
MINERAL RESOURCE ZONE 2
MINERAL RESOURCE ZONE 2A
MRZ OVERLAY

	DEVELOPMENT ALLOWED IN MRZ			NO DEVELOPMENT IN MRZ		
	ACRES	PARCELS	DU'S	ACRES	PARCELS	DU'S
Rural Lands (RL-40), 1du/40ac	2,220	46	63	1,552	41	47
Public/Semi-Public Facilities	-----	-----		-----	-----	
Semi-Rural Residential (SR-10), 1du/10,20ac	42	5	5	42	5	5
Office Professional	50	-----	-----	50	-----	-----
General Commercial	15	-----	-----	15	-----	-----
TOTAL RESIDENTIAL	2,262	51	68	1,594	46	52
TOTAL PROFESSIONAL	50	-----	-----	50	-----	-----
TOTAL COMMERCIAL	15	-----	-----	15	-----	-----

SCALE: 1" = 2000'

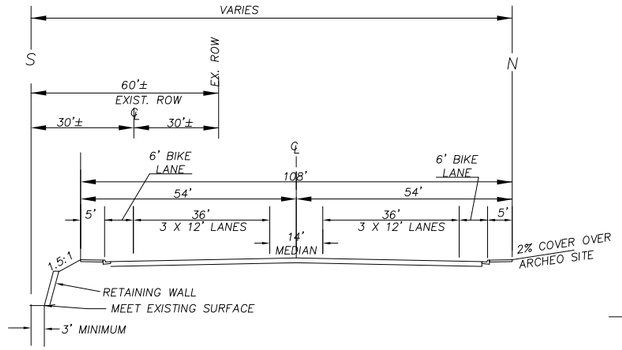
SOURCE: FUSCOE ENGINEERING

Alternative E - GP 2020 Consistent

FIGURE 5.1-5

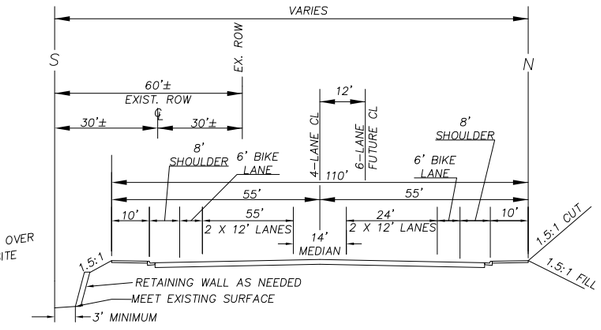
MERRIAM MOUNTAINS SPECIFIC PLAN EIR

N



SECTION A-A
DEER SPRINGS ROAD

NOT TO SCALE

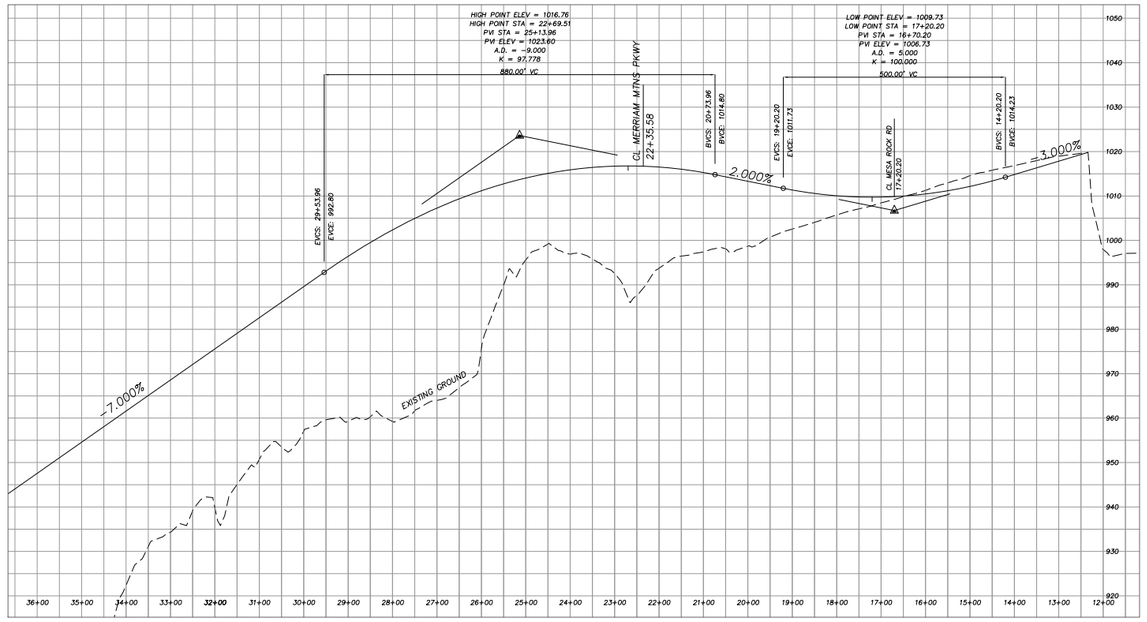


TYPICAL 4-LANE SECTION
DEER SPRINGS ROAD

NOT TO SCALE

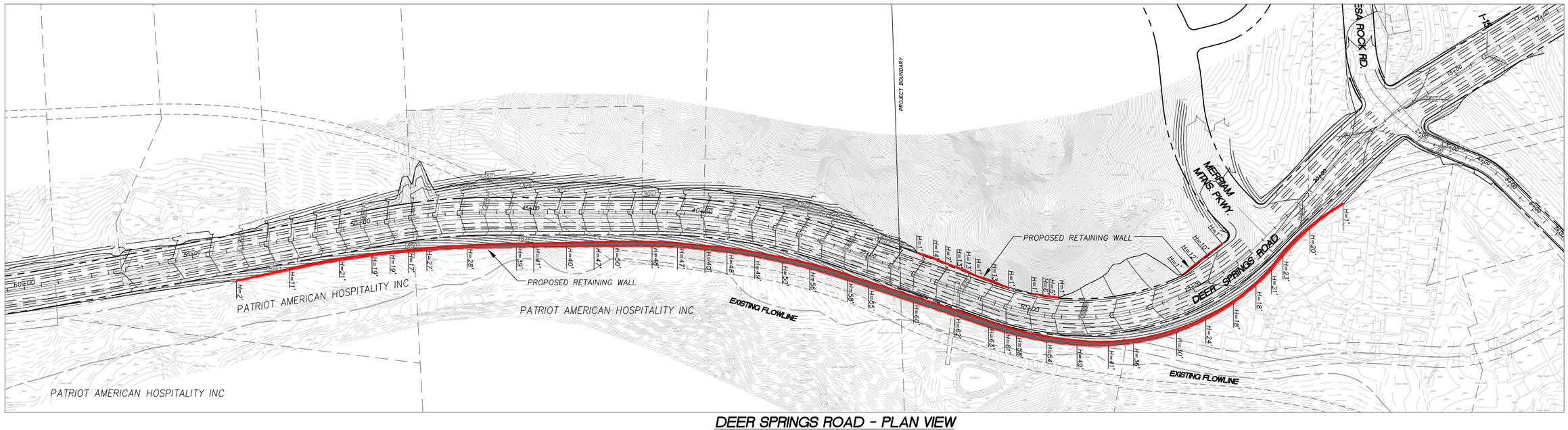
NOTE:

"*This figure has been provided to depict an alternative alignment to minimize impacts to cultural resources along the eastern portion of Deer Springs Road; see Fig 1.1-15A and 1.1-15B in Chapter 1.0, Project Description, for accurate portrayal of entire proposed alignment from the I-15 Interchange to Twin Oaks Valley Road*"



PROFILE - DEER SPRINGS ROAD

HORIZ. SCALE: 1" = 150' VERT. SCALE: 1" = 15'



DEER SPRINGS ROAD - PLAN VIEW

BASE SOURCE: FUSCOE ENGINEERING

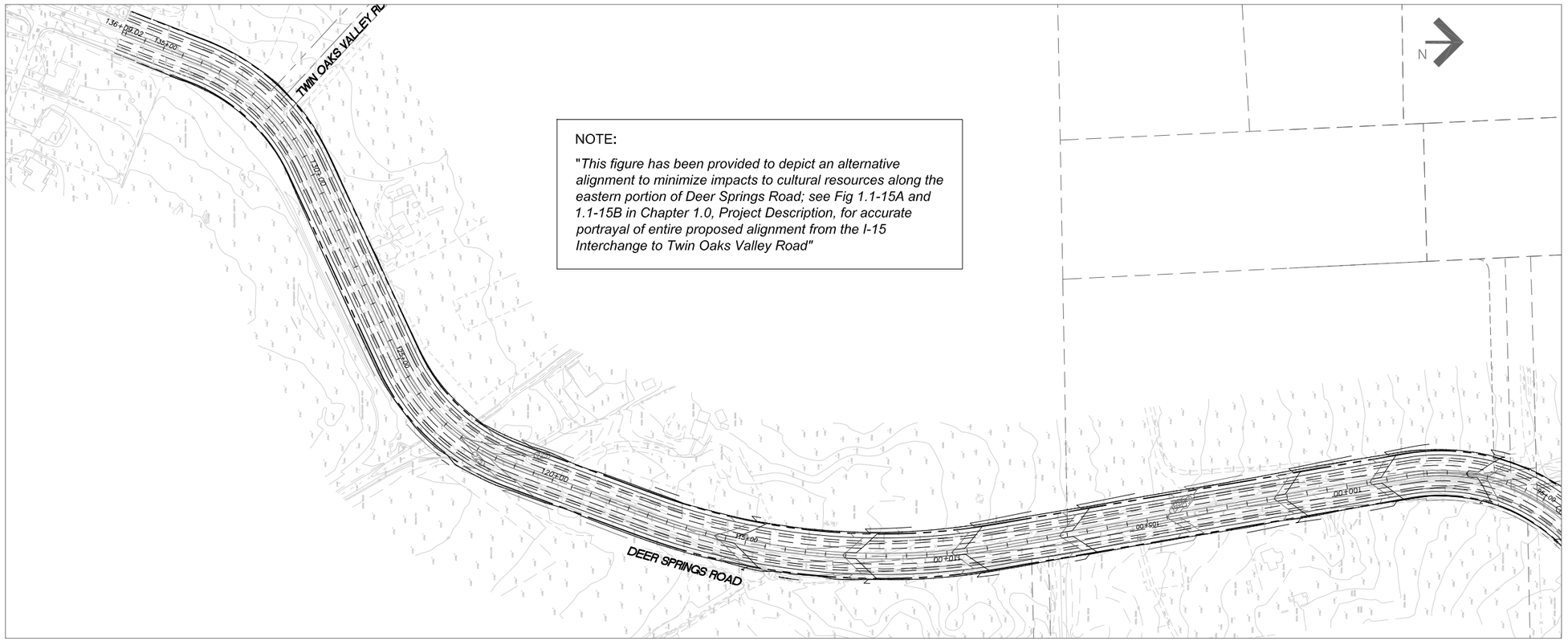
Alternative F - Off-Site Roadway Improvements along Deer Springs Road (Station 15+00 to Station 60+00)

FIGURE 5.1-6A

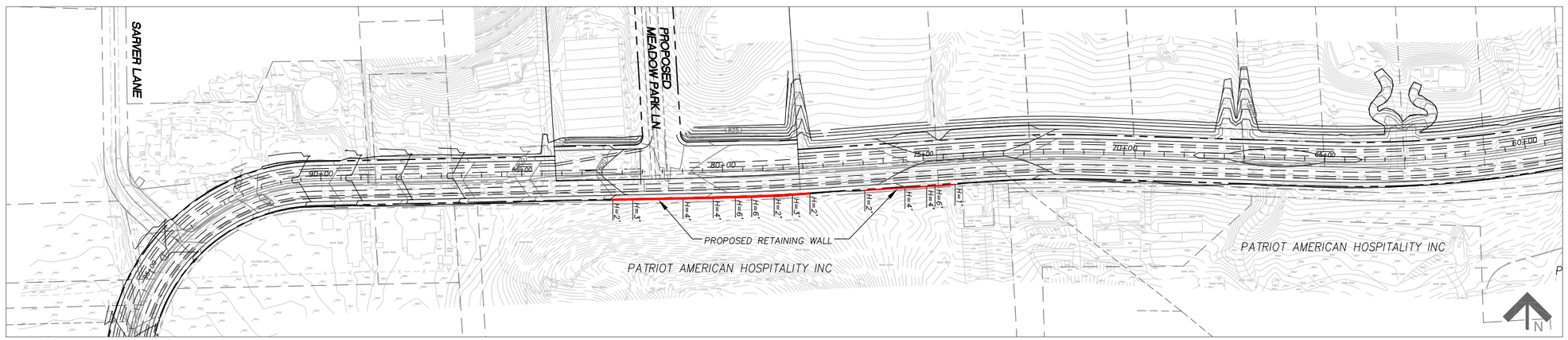
MERRIAM MOUNTAINS SPECIFIC PLAN EIR

300 150 0 300
FEET

N



DEER SPRINGS ROAD - PLAN VIEW Station 95+00 to Station 136+09.02



DEER SPRINGS ROAD - PLAN VIEW Station 60+00 to Station 95+00

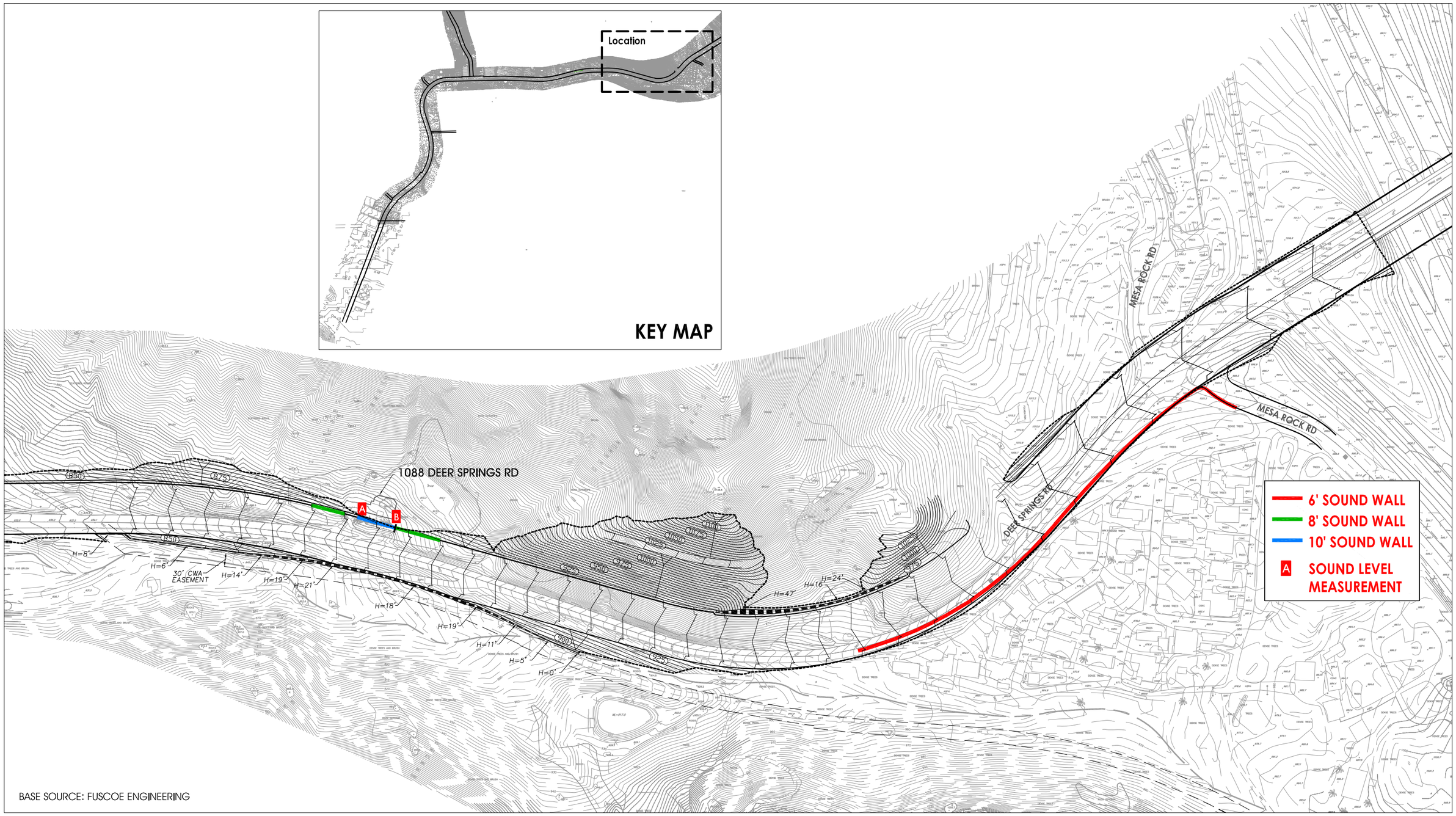
BASE SOURCE: FUSCOE ENGINEERING

Alternative F - Off-Site Roadway Improvements along Deer Springs Road (Station 60+00 to Station 136+09.02)

FIGURE 5.1-6B

MERRIAM MOUNTAINS SPECIFIC PLAN EIR

300 150 0 300
FEET



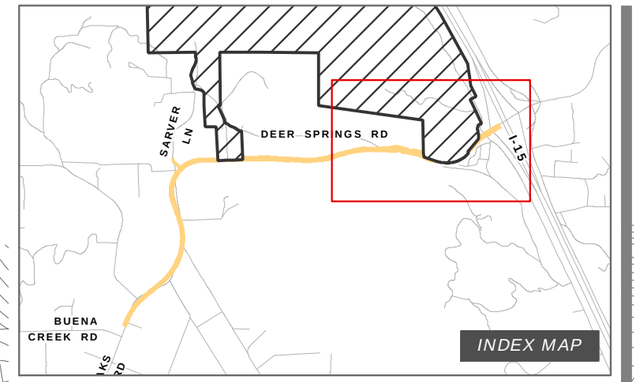
Alternative G - Off-Site Roadway Improvements along Deer Springs Road - Avoidance of Residence at 1088 Deer Springs Road

FIGURE
5.8-1A

MERRIAM MOUNTAINS
SPECIFIC PLAN EIR

200 100 0 200
FEET

N



Legend

Off-Site Roadway Limit of Impact for Avoidance of 1088 Deer Springs Road Residence

Limits of On-Site Project Boundary

County/CDFG Wetlands

Coast Live Oak Woodland Associated with Stream Course (Code: 71160)

Upland Vegetation Types/Landcovers (Holland Codes):

Southern Mixed Chaparral (Granitic) (Code: 37121)

Coastal Sage-Chaparral Scrub (Code: 37920)

Coastal Sage-Chaparral Scrub (disturbed) (Code: 37920)

Vegetation Categories that are not Sensitive Habitat

Urban/Developed (Code: 12000)

County Wetlands/Vegetation & Species Data Source: Pacific Southwest Biological Services, Inc. & Dudek

Z:\Projects\j387701Figs_EIR\Section05\EIR_Fig5-8-1b_DSRd_MandaricAvoidBio.mxd

Alternative G - Off-Site Roadway Improvements along Deer Springs Road - Avoidance of Residence at 1088 Deer Springs Road - Biological Resources Map

FIGURE 5.8-1B

MERRIAM MOUNTAINS SPECIFIC PLAN EIR

0 150 300 600

Feet

N